Inspector Worksheet

Inspector: DAVE WHITING

JKH 9/28/10

Facility Name: ~~St Louis Port Authority~~ Center Point Terminals Company

Address: Foot of Mullanphy St.

Media: RCRA **Federal Facility:** ☐ Yes

City: St. Louis **State:** MO **ZIP:** 63102 **County:** St. Louis

Facility Activity:	Inspection Type:	Selection Criteria - 1:	Selection Criteria - 2:
Distribution terminal for liquid asphalt. Tank storage.	CEI	Other	

ID Number:	Activity #:	NAICS/SIC Code:	Compliance Officer:
		493190/42269	BETH KOESTER

Quarter Requested:	Quarter:	Fiscal Year:	Last Inspection:	Planned Inspection:
4th	4	2010		08/24/2010

Major or Minor:	ACS Code:	Forward Copy of MMSC to:	Comments:

FF Commitment Comments:

Federal Facility Program Commitment:

Reason For Inspection:

John - Don asked that we inspect the St. Louis Port Authority in the 4th quarter. I'll be developing more info on this as the 4th quarter draws near, but I'd like you to please replace the Missouri 'reserved CEI' that's not specified for any particular target rationale, and replace it with the Port Authority target, as a place holder for now, so we don't lose the inspection slot.
thanks
Beth

replacement for GRX

WEMM requested Center Point Terminals Co. be inspected, rather than St. Louis Port Authority.
DMW

**** All information below is required and must be completed by the Inspector ****

Actual Inspection	Report Transmittal	Report Completion
8/25/10		

Potential EJ	Preliminary SNC Findings	NOV\NOPF Issued	Security Handout Provided	SBREFA
☑ Yes ☐ No ☐ N\A	☐ Yes ☑ No ☐ N\A	☑ Yes ☐ No ☐ N\A	☑ Yes ☐ No ☐ N\A	☑ Yes ☐ No ☐ N\A

MM Type	MM Level	MM Participating Program *	* A=CAA, W=CWA, R=RCRA, E/T=EPCRA/TSCA, U=UST, C=CFC, U-I=UIC, Wet, PWS, All

MM Screening Complete? ☑ Yes ☐ No ☐ N\A

MM Screening Forwarded? ☐ Yes ☐ No **If Yes, who?** →

☐ ALL ☐ CAA ☐ E/T ☐ EMS ☐ CFC ☐ RCRA ☐ ISO 14001
☐ CWA ☐ UST ☐ UIC ☐ PWS ☑ EJ ☐ SPCC ☐ Wetlands

Inspection Findings and Comments: (briefly list regulatory concerns or other compliance issues)

Target Quality (Good / Bad - Why?)

501865
RCRA

9/29/10
10/6/10

[redacted] Inspection Transmittal Summary Report

Media:
RCRA

Inspection Type:
CEI

Inspection Date:
08/25/2010

Preliminary SNC Findings:
No

Inspector:
DAVE WHITING

Transmittal Date:

NOV / NOPV / NOPF:
Yes

Facility Name:
Center Point Terminals

Address:
Foot of Mullanphy Street
St. Louis
MO
63102

ID Number:
MOD000690040

Activity Number:

MM Participationg Progams:

Federal Activity:
Distribution terminal for liquid asphalt. Tank storage.

Federal Facility:
No

Potential EJ:
Yes

SBREFA Provided:	Security Handout Provided:	MM Screening Completed:	EMS ISO 14001:	Compliance Officer:
Yes	Yes	Yes	No	BETH KOESTER

Selection Criteria 1:
Other

Selection Criteria 2:

ACS Code:

Inspection Findings:

Comments:

Target Quality:

REPORT OF RCRA COMPLIANCE EVALUATION INSPECTION

At

CENTER POINT TERMINALS COMPANY
Foot of Mullanphy Street
St. Louis, MO 63102
EPA I.D. Number: MOD000690040
Phone No.: (314) 621-0522

On

August 25, 2010

By

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region VII
Environmental Services Division

INTRODUCTION

At the request of the Air and Waste Management Division (AWMD), I conducted a RCRA Compliance Evaluation Inspection (CEI) at Center Point Terminals Co. in St. Louis, MO on August 25, 2010. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended. The CEI was a Level B Multi-Media Inspection. A Multi-Media Screening checklist is attached to this report (attachment 1). This narrative report and attachments present the results of the CEI.

PARTICIPANTS

Center Point Terminals Co. (CPTC):
Tim Bishop, Terminal Supervisor

U.S. Environmental Protection Agency (EPA):
David N. Whiting, Environmental Engineer

INSPECTION PROCEDURE

Upon arrival at CPTC, I contacted Mr. Bishop and presented him my credentials. I explained to Mr. Bishop the purpose of the CEI and the procedure I would follow. I also discussed the confidentiality of business information with him. I explained to Mr. Bishop my need to collect accurate information and left with him a copy of U.S. Federal Code Sections 1001 & 1002. The

fuel oil had been shipped to the affiliated terminal about two weeks ago (attachment 10 page 7).

Mr. Bishop said that only one storage tank has been cleaned out. The largest and oldest of the six fuel oil tanks was cleaned out in 2009 (attachment 10 page 5). The sludge removed from the tank was determined to be a non-hazardous waste based upon testing. I obtained a copy of the test results (attachment 7). Thirteen roll-off boxes of sludge, each about 20-cubic yards in size, were disposed in the Roxana landfill between July and October 2009 (attachment 8).

Wastes

Spent solvent is generated from use of one small parts washer (attachment 10 page 5). The solvent used is a mineral spirits Stoddard solvent (attachment 9), and the spent solvent is likely an ignitable hazardous waste, D001. Mr. Bishop said that they consider the spent solvent reusable as fuel and add it to used oil they generate, which is added to one of the fuel oil tanks. Mr. Bishop estimated that about 10 gallons of spent solvent are generated each year.

Used oil is generated from equipment maintenance and oil changes on three vehicles, and consists of lube oil and hydraulic oil (attachment 10 pages 6-7). Mr. Bishop estimated that the amount of used oil generated is 40 to 50 gallons each year. Mr. Bishop said that they consider the used oil reusable as fuel and periodically add it to one of the fuel oil tanks. The used oil is accumulated in one 939-gallon above ground tank. The used oil tank was not marked "used oil" (attachment 12, photos 1-2). This is a violation of 40 CFR 279.22(c) (**NOV #1**). When I spoke with Mr. Bishop on 09/17/10, I informed him that addition of the used oil to the fuel oil, which is blended with other residual fuel oils at an off-site location for use as fuel, is marketing used oil fuel and requires compliance with used oil fuel marketer regulations. I suggested to Mr. Bishop that he refer to the Missouri Department of Natural Resources website for information on used oil marketer regulations (attachment 10 page 7).

Spent lamps consist of fluorescent lamps from office and shop areas and high intensity discharge (HID) lamps from outside areas (attachment 10 page 5). Mr. Bishop said that he did not know how many spent lamps are generated. It appeared that there are about 100 fluorescent lamps in use and about 25 HID lamps in use. Mr. Bishop said that the spent lamps are discarded with the general trash. Mr. Bishop acknowledged that he was not aware that the spent lamps contain mercury. I determined that this represents a failure to make a hazardous waste determination, which is a violation of 40 CFR 262.11 (**NOV #2**). I spoke with Mr. Bishop on 08/31/10, at which time he reported that they generate about 10 spent fluorescent lamps and about five spent HID lamps each year (attachment 10 page 5).

SUMMARY

At the exit interview we discussed the violations cited and the desirability of a CPTC representative to respond to the cited violations, in writing, within 14 days. I recommended to Mr. Bishop that a CPTC representative visit locations and companies that recycle or dispose of wastes shipped off-site from CPTC. I suggested this as a best management practice and not out of any particular concern about the facilities chosen for recycling, treatment or disposal of wastes.

David N. Whiting
Environmental Engineer
Date: 9/23/10

Attachments

1. Region VII multi-media screening checklist (2 pages)
2. Notice of Violation (1 page)
3. Confidentiality Notice (1 page)
4. Receipt for Samples and Documents (1 page)
5. Facility diagram and aerial photo (3 pages)
6. SPCC plan, excerpt (5 pages)
7. Tank sludge test results (9 pages)
8. Roxana manifests, typical (2 pages)
9. Solvent MSDS (5 pages)
10. Inspection data gathering sheets (8 pages)
11. Photo log (1 page)
12. Photographs, 2 photos (1 page)

Forward To: EJ ☑ EPCRA / RMP / TSCA ☐ CWA ☐ Wetlands ☐ UIC ☐ PWS ☐ CAA / CFC ☐ RCRA ☐ UST ☐ SPCC ☐

REGION VII MULTIMEDIA SCREENING CHECKLIST

Facility Name: Center Point Terminals Co.
Facility Ownership:
Street: Foot of Mullanphy Mullanphy St.
City: St. Louis State: MO Zip: 63102
Phone: (314) 621-0522 Facility Contact: Tim Bishop
Number of Employees: 7 Work Hours/Shifts 24hr 5 days

Inspector David N. Lehrting
Primary Media: RCRA
Inspector Phone Ext.: (319) 887-2648
Date: 8/25/19
SIC/NAICS Code 4226 / 493190
Facility Subject to OSHA regulations Yes ☑ No ☐

Main facility activity, major process chemical(s) & description: asphalt distribution. receive by barge, heated storage, dist from rack or to barge. no longer active in residual fuel + some left on-site supposed to go off-site 6/in month. Site dates back to 1903. Large tanks const. '70's.

(Check all that apply): painting/coating (water-based ☐, solvent-based ☐), printing ☐, reacting ☐, formulating ☐, distilling ☐, water treatment ☐, refrigeration ☐, manufacturing ☐, parts washers/degreasing (water-based ☐, halogenated-based ☐, non-halogenated-based ☑), combustion (boiler, furnaces, oxidizers) ☐ plating (chrome ☐, other _____).
nat. gas fired

ENVIRONMENTAL JUSTICE (Note: Forward to EJ if a concern is identified during your inspection)

1. Is the facility located in an apparent low income area (e.g., with many abandoned and dilapidated properties)? No ☐ (stop) Yes ☑
   If yes, is facility less then 1000 feet from nearest routinely occupied property (house, school, etc.)? No ☐ (stop) Yes ☑ ***Forward to EJ***

EMERGENCY PLANNING & COMMUNITY RIGHT TO KNOW ACT (EPCRA) & TOXIC SUBSTANCE CONTROL ACT (TSCA)

1. Did facility file a Tier II report with fire department, Local & State Emergency Planning Committee? Yes ☑ No ☐ ***Forward to EPCRA***
2. Did facility manufacture, import, or process (formulate, blend, package) >25,000 lbs of a chemical or >100 lbs of a Persistent Bioaccumulative Toxin (lead, mercury, or polycyclic aromatic compounds) at any time over the last 5 years? No ☐ (stop) Yes ☐ ***Forward to EPCRA***
3. Has the facility: ***If any box in question 3 is marked - Forward to EPCRA***
   a. Stored ≥500 lbs of ammonia ☐, ≥100 lbs of chlorine ☐, or ≥10,000 lbs of an industrial chemical ☐, at any time over the last 2 years? ☐
   b. Stored ≥10,000 lbs of pressurized flammable material (propane, methane, butane, pentane, etc.) at any time over the last 2 years? ☐
   c. Used ≥10,000 lbs of ammonia ☐, chlorine ☐, halogenated solvents ☐, solvent-based paints ☐, or solvents ☐, or nitrated compound, over the last calendar year? ☐
   d. Generated ≥ one half pound of metal dusts, fumes, or metal turnings, over the last calendar year? ☐
4. Does the facility have any oil filled electrical equipment No ☐ (stop) Yes ☐ ***Forward to TSCA and ask*** Has facility tested oil filled equipment to determine PCB content; No ☐ Yes ☐ number containing PCBs greater than 50 ppm _____ and percent of all equipment tested _____. Is equipment leaking (including wet or weeping equipment)? No ☐ Yes ☐ – ***Get Photo***

Amerion transformer maybe not on property?

CLEAN WATER ACT (CWA) - National Pollution Discharge Elimination System (NPDES), Industrial Pretreatment, Storm Water, & Wetlands

1. Does the facility discharge any wastewater to storm sewers, surface water, or the land? No ☑ (stop) Yes ☐
   If yes, are all wastewater discharges permitted? Yes ☐ No ☐ ***Forward to CWA***
2. Does the facility have process wastewaters that are discharged to a city POTW (Publicly Owned Treatment Works)? No ☑ (stop) Yes ☐
   If yes, are the discharges permitted by: State? ☐, City? ☐ – If yes, Stop here. No ☐ ***Forward to CWA***
   If yes, does the city have a state or EPA approved pretreatment program? Yes ☐ No or Don't Know ☐ ***Forward to CWA***
3. During rainfall events, can storm water carry pollutants from manufacturing, processing, storage, disposal, shipping and receiving areas, or from construction sites >1 acre, to storm sewers or surface water? No ☑ (stop) Yes ☐
   If yes, does the facility have an NPDES permit for these storm water discharges? Yes ☐ No ☐ ***Forward to CWA***
4. Did you see any wastewater discharges not identified by the facility? No ☐ (stop) Yes ☐ - Identify location, time, appearance of discharge: _____ (***Get Photo***) ***Forward to CWA***
5. Does the facility have any wetland areas (e.g. streams, ponds, or temporarily wet areas)? No ☑ (stop) Yes ☐
   If yes, have any wetland areas been dredged, filled, channelized, dammed, or had gravel removed from them within the last 5 years?
   No ☐ (stop) Yes ☐ - Identify location and timeframe _____ (***Get Photo***) ***FWD to Wetlands***

SAFE DRINKING WATER ACT (SDWA) - Underground Injection Control (UIC) & Public Water System (PWS)

1. Does facility discharge any liquids to the subsurface (septic systems, disposal wells, cesspools, etc.)? No ☑ (stop) Yes ☐ ***Forward to UIC***
   If yes, do these liquid wastes consist of sanitary wastewater only? Yes ☐ No ☐
2. Does facility provide drinking water to 25 people or more from its own source (private well, pond, etc)? No ☑ (stop) Yes ☐ ***Forward to PWS***
   If yes, does the facility test or monitor its drinking water in order to comply with state regulations? Yes ☐ No ☐

CLEAN AIR ACT (CAA) and CFCs

1. Do you see any dense, non-steam, smoke or dust emissions leaving the facility property? No ☑ Yes ☐ ***Forward to CAA***
   Source_____ ***(Get Photo)***
2. Does the facility have any new air pollution emitting equipment that was constructed or installed in the past 5 years? No ☑ (stop) Yes ☐
   If yes, is equipment permitted? Yes ☐ No ☐ ***Forward to CAA*** *Describe:*_____
   _____
3. Does the facility have any cooling units that contain >50 lbs of refrigerant? No ☑ (stop) Yes ☐ ***Forward to CFC***
   If yes, are these units: Self-serviced? ☐ Contract Serviced? ☐ - Service Company:_____
4. Does the facility have a refrigeration process that contains more than 10,000 lbs of ammonia ? No ☑ (stop) Yes ☐ ***Forward to EPCRA/RMP***
5. Does the facility service motor vehicle air conditioning systems? No ☑ (stop) Yes ☐ ***Forward to CFC***

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) and UNDERGROUND STORAGE TANKS (UST)

1. Does the facility generate more than 30-gallons (220 lbs./100kg) of hazardous waste per month or at any one time? No ☑ (stop) Yes ☐
   If yes, does facility have an EPA Hazardous Waste Identification Number? Yes ☐ (stop) No ☐ ***Forward to RCRA***
2. Is hazardous waste treated ☐ , stored >90-days ☐, burned ☐ , land filled ☐ , put in surface impoundments ☐ or waste piles ☐ ?
   No ☐ (stop) Yes ☐ If yes, is the facility permitted for above described activity? Yes ☐ No ☐ ***Forward to RCRA***
3. Did you see or does the facility have any large quantities of materials that the facility claims to be non-hazardous waste material (>10 drums, roll-offs, waste piles, etc. – exclude clean office trash, cardboard, & packaging type wastes)? No ☐ (stop) Yes ☐

Material Claimed To Be Non-Hazardous	How does the facility know these wastes are non-hazardous?
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***
_____	Testing, industry or manuf. info.., MSDS, etc. ☐ ; None available ☐ ***Forward to RCRA***

4. Did you see any leaking hazardous waste containers, drums, or tanks? No ☑ Yes ☐ ***Forward to RCRA***
   Describe:_____ ***(Get Photo)***
5. Did you see any signs of spills or releases (e.g., dead or stressed vegetation, stains, discoloration)? No ☑ Yes ☐ ***Forward to RCRA***
   Describe:_____ ***(Get Photo)***
6. Did you see any chemical or waste handling practices that concern you (access to children/public)? No ☑ Yes ☐ ***Forward to RCRA & EPCRA*** Describe:_____ ***(Get Photo)***
7. Does the facility have any past or present underground petroleum product or hazardous material tanks? No ☐ Yes ☐ ***Forward to UST***
8. Does the facility have any underground fuel tanks for emergency generators? No ☑ Yes ☐ ***Forward to UST*** Not Sure

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN (SPCC)

1. Does the facility have any aboveground oil tanks (petroleum, synthetic, animal, fish, vegetable), with an aggregate volume >1,320 gallons?
   No ☐ (stop) Yes ☑ - Does the facility have a certified SPCC Plan? Yes ☑ No ☐ ***Forward to SPCC***
   If yes, are there secondary containment systems for the tanks? Yes ☑ No ☐ ***Forward to SPCC***
   If yes, are any tanks leaking where oil could reach waters of the State or U.S.? No ☐ Yes ☐ ***(Get Photo) Forward to SPCC***

ENVIRONMENTAL MANAGEMENT SYSTEMS (EMS)

1. Does your facility have an EMS? No ☑ Yes ☐
2. Is the facility's EMS ISO 14001 certified? No ☑ Yes ☐

**** PLEASE TAKE PHOTOS TO DOCUMENT POTENTIAL PROBLEMS***

Version 08.23.05a GRAY SHADED AREAS INDICATE ITEMS YOU NEED TO LOOK FOR DURING VISUAL INSPECTION

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Center Point Terminals Co.
Address: Foot of Mullanphy Street
St. Louis, MO 63102
EPA ID Number: MODX069040 Date: 8/25/10

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation	Description of Violation
40 CFR 279.22 (c)	Used oil tank (939-gal. cap) is not marked
10 CSR 25-11.279(1)	used oil.
40 CFR 262.11	Failure to make a hazardous waste
10 CSR 25-5.262(1)	determination on spent lamps disposed as waste.

You are requested to submit a written response within **14 calendar days** of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII
David M. Whiting
901 Walnut St.
Iowa City, IA 52240
ATTN.

If you have any questions about this Notice or wish to discuss your response, you may call me at (319) 887-2618, or Elizabeth Koesterer (Compliance Officer) at (913) 551-7673.

This Notice prepared by David M. Whiting Date: 8/25/10

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Tim R. Bishop Date: 8/25/10
Signature: Tim R Bishop
Title:

ATTACHMENT 2 Page 1 of 1

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
CONFIDENTIALITY NOTICE

Facility Name Center Point Terminals Co.	
Facility Address Foot of Mullanphy St. St. Louis, MO 63102	
Inspector (print) David M. Whiting	
U.S. EPA, Region VII, 901 N. 5th St., Kansas City, KS 66101	Date 8/25/10

The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. No statute specifically requires disclosure of the information.

3. Disclosure of the information would cause substantial harm to your company's competitive position.

Information that you claim confidential will be held as such pending a determination of applicability by EPA.

I have received this Notice and DO NOT want to make a claim of confidentiality at this time.	
Facility Representative Provided Notice (print) Tim R. Bishop	Signature/Date Tim R. Bishop 8/25/10

I have received this Notice and DO want to make a claim of confidentiality.	
Facility Representative Provided Notice (print)	Signature/Date

Information for which confidential treatment is requested;

_____

_____

_____

_____

_____

(Rev:1/19/00)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name
Center Point Terminals Co.

Facility Address
Foot of Mullanphy St. St. Louis, MO 63102

Documents Collected? YES ✓ (list below) NO___

Samples Collected? YES___ (list below) NO ✓ Split Samples: YES___ NO___

Documents/Samples were: 1) Received no charge ✓ 2) Borrowed___ 3) Purchased___

Amount Paid: $_____ Method: Cash___ Voucher___ To Be Billed___

The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.

==========

Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:

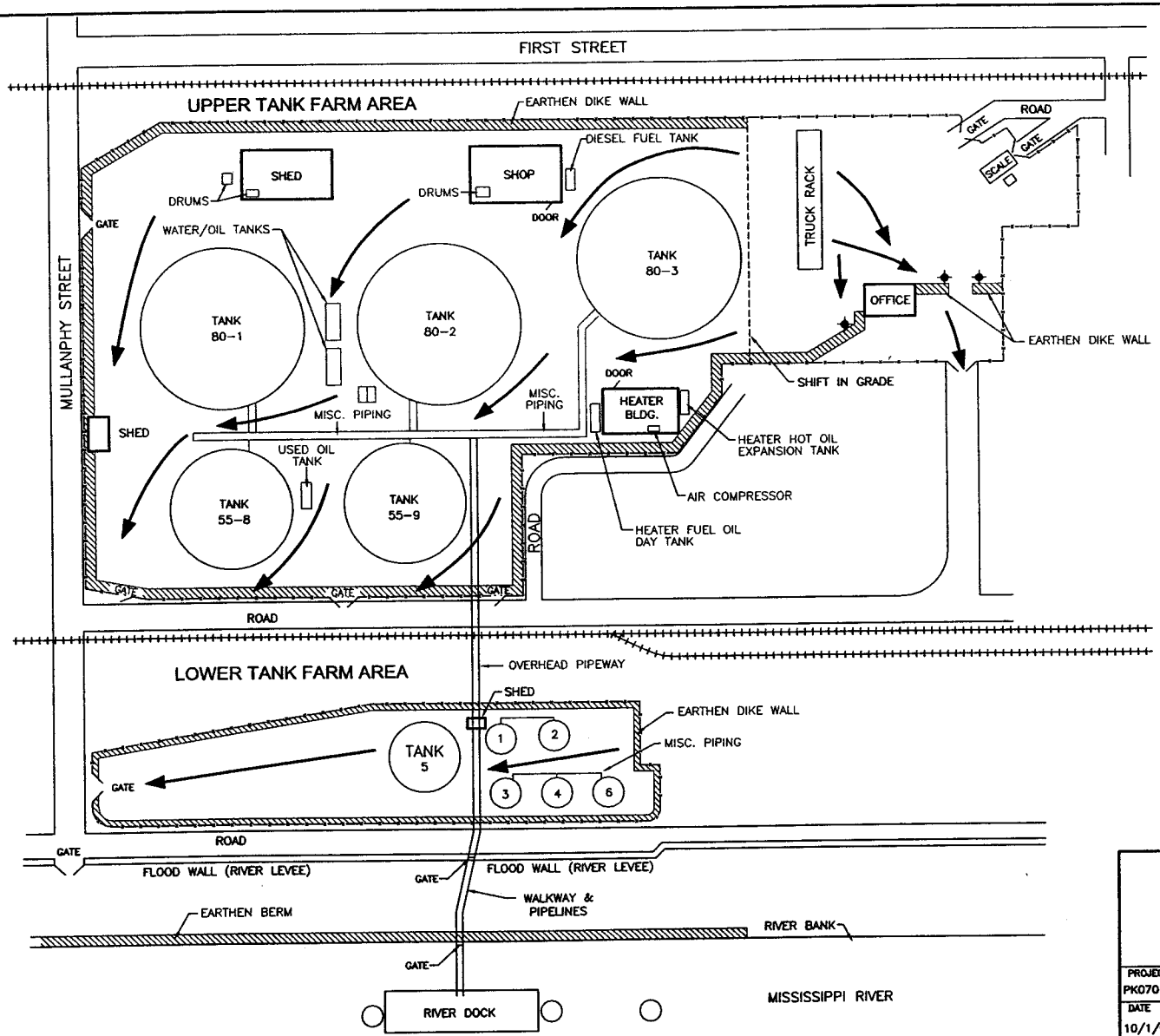
1) Tank farm diagram (1 page)
2) SPCC excerpt (5 pages)
3) Sample analysis results (7 pages)
4) Non-regulated manifests for fuel oil tank heels disposal (2 pages)
5) MSDS for parts washer solvent (5 pages)

Facility Representative (print)	Signature/Date
Tim R. Bishop	Tim R. Bishop 8/25/10
Inspector (print)	Signature/Date
David M. Whiting	David M. Whiting 8/25/10

U.S. EPA, Region VII, 901 N. 5th Street, Kansas City, KS 66101

(rev:1/20/93)

ATTACHMENT 4 Page 1 of 1



LEGEND

- RAILROAD TRACKS
- FENCE
- DRAINAGE DIRECTION
- STORMWATER VALVE

NOTE: OIL TRANSFERS CAN OCCUR INFREQUENTLY NEAR SMALL TANKS.

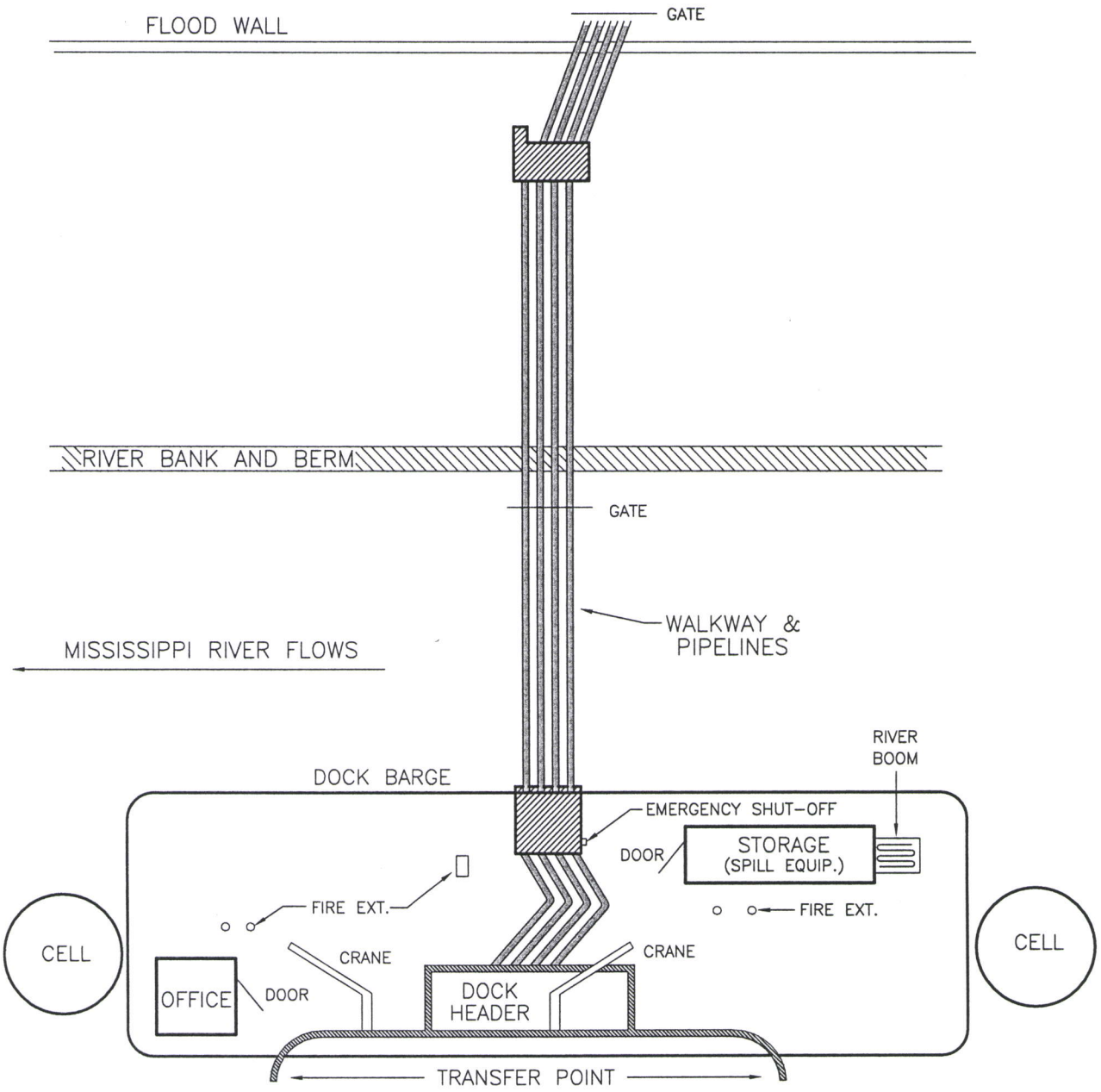
North

NOT TO SCALE

FIGURE 2-A
SITE MAP AND DRAINAGE DIAGRAM
ST. LOUIS TERMINAL
ST. LOUIS, MISSOURI

PROJECT NO.	PREPARED BY	DRAWN BY	
PK070-2PFT	CM	DD	DELTA
DATE	REVIEWED BY	FILE NAME	
10/1/07		STL-Term	

ATTACHMENT 5 Page 1 of 3



NOTE: REFER TO USCG OPERATIONS MANUAL LOCATED UNDER SEPARATE COVER FOR SPILL CONTINGENCY PROVISIONS ASSOCIATED WITH DOCK TRANSFERS.

North

NOT TO SCALE

FIGURE 2-B
DOCK BARGE AREA
ST. LOUIS TERMINAL
ST. LOUIS, MISSOURI

PROJECT NO.	PREPARED BY	DRAWN BY
PK070-2PFT	CM	DD
DATE	REVIEWED BY	FILE NAME
10/1/07		STL-Barge

DELTA

Google maps

To see all the details that are visible on the screen, use the "Print" link next to the map.

Print Send Link

Correctional Facility

Tent City Area

Tank that was cleaned out in 2009

ATTACHMENT 5 Page 3 of 3

4.0 FACILITY DESCRIPTION, DISCHARGE PREVENTION, AND COUNTERMEASURES

4.1 Physical Layout

Regulatory Requirement: *Describe the physical layout of the facility and include a facility diagram, which marks the location and contents of each container. The diagram must include completely buried tanks, transfer stations, and connecting pipes. (40 CFR 112.7(a)(3))*

At this facility: The Center Point Terminal Company site (referred to herein as the "facility") is a bulk liquid petroleum tank storage terminal located approximately 1/2 mile southwest of downtown St. Louis, Missouri. It occupies approximately 4.9 acres of land near the Mississippi River. Primary physical improvements include five asphalt tanks and 6 fuel oil tanks (product tanks), plus an asphalt tank truck loading rack. A small amount of additional oil is in miscellaneous small tanks and drums, plus mechanical and electrical equipment. Petroleum Fuel and Terminal Company is the site operator under a service agreement with Center Point Terminal Company, the owner of the facility assets.

The site has two tank dike areas referred to as the Upper Tank Farm Area that encompasses the asphalt tanks and the Lower Tank Farm Area that surrounds the fuel oil tanks. Stormwater drainage from both tank areas remains within dikes to evaporate. The facility does not discharge stormwater runoff directly to a navigable waterway and an onshore oil spill would not likely reach waters of the United States because the site is further separated from the River by a flood control dike (levee).

A topographical map is included in Appendix A of this SPCC Plan as Figure 1. The facility site grade varies approximately 10 feet in elevation between the Upper and Lower Tank Farm areas. The two tank areas have a generally flat topography that gently slopes down to the southeast side of each dike area where stormwater may pool. Appendix B contains Figure 2, a site plan and drainage diagram that shows the locations of oil tanks, loading rack, and miscellaneous equipment, plus the general direction of stormwater drainage. Appendix C contains photos of equipment locations given on the site plan.

4.2 Types of Oil, Discharge Prevention Measures, and Discharge or Drainage Controls

Regulatory Requirement: *Address the type of oil in each container and its storage capacity. (40 CFR 112.7(a)(3)(i)). Address discharge prevention measures including procedures for routine handling of products. (40 CFR 112.7(a)(3)(ii)). Address discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge. (40 CFR 112.7(a)(3)(iii)*

At this facility: The facility's total regulated oil container capacity including product tanks and miscellaneous containers is approximately 383,472 barrels (16,107,082 gallons) of shell capacity. Primary products handled include asphalt and fuel oils. In the following sections and tables, potential spill sources are categorized in terms of oil type, storage tank capacity, truck oil transfer areas, and types of miscellaneous oil-filled operational equipment.

Storage of chemicals and other non-oil hazardous substances is not addressed in this SPCC Plan. Oil discharge and drainage control emphasis in this report is placed upon secondary containment such as tank dikes, and upon active discharge prevention or control measures available to use in other facility areas. Additional details on secondary containment are provided in Section 15.0 of this SPCC Plan ("Bulk Storage Containers").

4.2.1 Oil Storage Tanks and Drums

This facility's oil storage volume for storage containers 55 gallons in size or greater includes product and miscellaneous aboveground storage tanks (ASTs), plus some drums. The tank table and text elaboration below provides additional information about tank size and tank secondary containment capacity to prevent discharged oil from reaching the Mississippi River (River). Refer also to Figure 2 in Appendix B.

Oil Storage Tank and Drum Secondary Containment			
Storage Tank I.D. & Type of Oil	**Shell Capacity (Barrels)**	**Shell Capacity (Gallons)**	**Secondary Containment (Barrels) [1/]**
UPPER TANK FARM AREA			
Asphalt Tank #80-1	80,931	3,399,102	Earthen diking (98,454)
Asphalt Tank #80-2	81,028	3,403,176	Earthen diking (98.454)
Asphalt Tank #80-3	80,894	3,397,548	Earthen diking (98.454)
Asphalt Tank #55-8	54,172	2,275,224	Earthen diking (98.454)
Asphalt Tank #55-9	54,252	2,278,584	Earthen diking (98.454)
Misc. Tanks & Drums Within Upper Dike			**Locations Within Diking** (98.454)**:**
Hot Oil (Therminol) Expansion Tank	50	2,114	North Side of Heater Building
Heater Fuel Supply Oil Day Tank	233	9,769	Near Heater Building
Used Oil Tank	22	939	Fiberglass tank
Water/Oil Tank	242	10,164	Oil/water separator tank use
Water/Oil Tank	242	10,164	Tank may contain oil on occasion
Raised Diesel Fuel Tank	7	275	North side of Shop Building
Drums, Empty (15)	-	~825	[2/] As needed, south of Shed Building
Drums, Shed (2)	-	~110	[2/] Inside Shed Building
Drums, Shop (6)	-	~330	[2/] Inside Shop Building
LOWER TANK FARM AREA			
(Out of Service: Dec 2008) #6 Oil Tank 1	3,776	158,592	Earthen diking (19,363)
(Out of Service: Dec 2008) #6 Oil Tank 2	3,776	158,592	Earthen diking (19,363)
(Out of Service) #2 Oil Tank 3	2,613	109,746	Earthen diking (19,363)
(Out of Service: Oct 2008) #6 Oil Tank 4	3,762	158,004	Earthen diking (19,363)
(Out of Service) Tank 5	13,689	574,938	Earthen diking (19,363)
(Out of Service: Oct 2008) #6 Oil Tank 6	3,776	158,592	Earthen diking (19,363)
Small Used Oil Tank Within Lower Dike	7	294	Earthen diking (19,363)
TOTALS [3/]	**383,472**	**16,107,082**	

~125 Kgal in each tank still onw

FOOTNOTES: (1) Secondary containment capacity is estimated based upon facility drawings and site observations and takes into account the volumetric capacity displaced by tanks within the dike or other secondary containment areas. Refer to Appendix D for an approximation of available containment capacity with allowance for sufficient freeboard to contain precipitation; (2) Drums are considered storage containers that are like tanks for facility overall (aggregate) storage capacity inclusion; (3) Totals exclude tanks that are out of service and also exclude drums.

UPPER TANK FARM AREA CONTAINERS

Asphalt Tanks

The five (5) large tanks in the Upper Tank Farm Area are used for asphalt storage. These tanks are insulated with thermo panels and have hot oil coils within that keep the asphalt a free flowing liquid (~280-320°F). Secondary containment consists of earthen diking (aka berm or bund wall) as is typical of

petroleum tank farms. This dike extends to the north of the asphalt tanks to meet an earthen berm extension that serves as containment for the Asphalt Loading Rack area of the facility.

However, the dike does not completely surround the tanks. Instead, on the north side of the tanks there is a grade separation between the tanks and the loading rack. The tanks are approximately 4 feet below the grade of the loading rack. Spilled liquid from the northernmost tank would remain in the Upper Dike Tank Farm Area and flow south. However, spilled liquid at the loading rack above the grade separation would flow in an opposite direction to the east of the loading rack into the area encompassed by the berm extension abutting the Office Building. Refer to photos in Appendix C.

Miscellaneous Tanks
Miscellaneous tanks in the Upper Tank Farm Area include small tanks that are not product tanks. Two tanks (expansion tank and heater fuel oil tank) are associated with the hot oil system for asphalt heating, three tanks are available for used oil or oil/water separation as needed, and one tank is used for tractor or other diesel vehicle fueling. These tanks are all within the earthen diking encompassing the asphalt tanks.

Drum Storage
There are approximately 15 drums maintained near the Shed Building that are available for asphalt or other oil storage if needed as a result of spill. Inside the Shed Building, there are two 55-gallons drums of hydraulic oil for onsite vehicle servicing. Also, inside the Shop Building, there are three 55-gallon drums of hydraulic oil for facility equipment. None of the drums have secondary containment in their respective locations. However, all drums are located within the tank farm area encompassed by earthen diking.

LOWER TANK FARM AREA CONTAINERS

Fuel Oil Tanks
The six tanks in the Lower Tank Farm Area are used for fuel oil and are unlikely to remain in oil service. The tanks are small in size in comparison to the Upper Tank Farm Area. The largest tank in the area (Tank 5) was built in 1903 and is no longer in service. An earthen dike wall surrounds the tanks. The dike secondary containment capacity is sufficient for the largest fuel oil tank in service.

Miscellaneous Tanks
The Lower Tank Farm Area has one small Used Oil Tank (275 gallons) with the earthen diking containment.

PRECIPITATION ALLOWANCE

Refer to Appendix D. The dike containment capacity for both tank farm areas is sufficient for the largest tank in each tank farm area plus sufficient freeboard for a 25 year, 24 hour maximum precipitation event that would cause water to collect in the dike areas. The containment volumes estimated reflect an allowance for a 6 inch rainfall event. Actual containment capacity available (as given in the table above) is more with dike areas maintained dry.

4.2.2 Oil-Filled Operational Equipment

4.2.2.1 Oil-Filled Mechanical Equipment

The facility does not have oil-filled mechanical equipment containing 55 gallons or more of oil subject to SPCC Plan regulation. The table below summarizes miscellaneous mechanical equipment containing oil

that is subject to periodic internal preventive maintenance inspection but that is not regulated as part of the aggregate oil storage capacity of the facility subject to SPCC Plan regulation.

Miscellaneous Oil Filled Equipment, Less Than 55-Gallon Oil Capacity	
Equipment ID	**Oil Volume (Gallons)**
Air Compressor, Static Internal Oil Volume	<55
Emergency Generator, Static Internal Oil Volume	<55
Tractors (2), Crankcase Oil	<55 each

4.2.2.2 Oil-Filled Electrical Equipment

The facility does not have any oil-filled electrical equipment containing 55 gallons or more of oil subject to SPCC Plan regulation. Pole transformers serving the site are less than 55 gallons and are the property of the local utility company.

Oil-Filled Electrical Equipment Secondary Containment		
Oil Container	**Oil Volume (Gallons)**	**Secondary Containment (Gallons)**
Utility Pole Transformers	< 55	Utility company units are not facility SPCC Plan regulated.
TOTAL	**< 55**	

4.2.3 Bulk Liquid Transfer Facilities

Bulk liquid transfer activities occur at the facility's truck loading rack, miscellaneous truck unloading spots, and at the dock on the Mississippi River. For spill prevention and contingency purposes, River dock transfers are regulated by the United States Coast Guard (USCG) and the facility has an approved USCG Operations Manual governing transfers. The balance of the bulk transfers are regulated by the federal Environmental Protection Agency (EPA) and are described in this SPCC Plan.

In particular, spills that can potentially occur at the facility's truck loading rack and at miscellaneous truck unloading spots (oil transfer areas) are discussed in this SPCC Plan and secondary containment, diversionary structures, and/or active control measures to prevent discharged oil from reaching navigable waters are also described. In addition, any best management practice (BMP) procedures that may be in place for the infrequent oil transfer operations, e.g., truck unloading of diesel oil, are referenced. A summary table of information is provided below following the narratives.

ASPHALT LOADING RACK

The facility has one constructed (walk up) Asphalt Loading Rack. It can be described as a 4 bay, 5 loading spot top loading rack for asphalt loading into tank trucks. Two grades of asphalt (aka PG 64-22 & P\G 46-28) from facility tank storage can be blended at the rack via their transfer/mix in trucks. The last bay on the west side of the rack also has an asphalt unloading spot. Asphalt additives are not injected into the asphalt at the rack or in tank storage. Facility operators load trucks with loading arms.

The Asphalt Loading Rack area has secondary containment available for a potential spill from the largest tank truck compartment (8,800 gallons). In particular, any asphalt spills that did not harden in the immediate loading rack area would flow downgrade into a parking lot/office building area that has an earthen berm for containment. Stormwater in this area pools before reaching the berms. Drainage during rainstorms is controlled by a total of 3 berm drain valves in the vicinity of the Office Building. Refer to Figure 2 Site Plot Plan and Drainage Diagram for locations.

MISCELLANEOUS TRANSFER SPOTS

The facility does have some miscellaneous unloading spots associated with the infrequent transfer of tank heating system oil, tractor or other vehicle diesel oil, off spec asphalt or fuel oil product, and used oil collection. These miscellaneous transfer spots do not involve the need for constructed truck racks but rather represent oil transfer points at the facility described as follows:

1. Asphalt Unloading Spot (southwest side of loading rack)
2. "Clean" Product Unloading Spot (at #2 bay)
3. "Dirty" Product Unloading Spot (to the east of the loading rack) for #2 and #6 oil receipt.
4. Hot Oil Expansion Day Tank Unloading Spot (Therminol ^{R})
5. Heater Fuel Supply Day Tank Unloading Spot (2 Natural Gas Heaters; One Can Burn Fuel Oil}
6. Equipment Diesel Fuel Tank Unloading Spot
7. Used Oil Tank Collection Spot

Oil transfers at these miscellaneous areas may involve tank truck transfers (in particular unloading of delivered oil). A single hose and connection is used for transfers involving unloading. None of these have constructed secondary containment in the immediate vicinity of the oil transfer spots but all seven unloading spots are within earthen containment associated with the tank farm or loading rack areas. Spills up to the size of the largest tank truck compartment would be contained in the vicinity of the spill and cleanup could proceed with absorbent pads or other equipment as needed.

Bulk Liquid Transfer Secondary Containment		
Loading/Unloading Location Name	**Spill Source Potential (Gallons)**	**Secondary Containment (Gallons)**
Asphalt Loading Rack (5 Bay)	Truck compartment (8,800 gallons)	Office/Parking Lot Berm (8,800)
Asphalt Unloading Spot	Truck compartment (8,800 gallons)	Earthen diking (87,964)
Clean Product Unloading Spot	Truck compartment (4,200 gallons)	Earthen diking (87,964)
Dirty Product Unloading Spot	Truck compartment (4,200 gallons)	Earthen diking (87,964)
Hot Oil Expansion Tank Unloading/Transfer Spot	Truck compartment (4,200 gallons) or drummed oil (55 gallons)	Earthen diking (87,964)
Heater Fuel Supply Day Tank Unloading Spot	Truck compartment (4,200 gallons)	Earthen diking (87,964)
Used Oil Tank Collection Spot	Truck compartment (4,200 gallons)	Earthen diking (87,964)
Equipment Diesel Fuel Tank Unloading Spot	Truck compartment (4,200 gallons)	Earthen diking (87,964)

Discharge prevention measures include tank inspection and spill and overfill prevention procedures included or referenced in Appendices F & H, respectively. Facility stormwater drainage is managed in compliance with 40 CFR 112.8 (b) as discussed in Section 14.0 of this SPCC Plan.

TEKLAB, INC.

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ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

April 13, 2009

tank #5

Tim Bishop
Apex Oil Co./Petroleum Fuel & Terminal Co.
Foot of Mullanphy Street
St. Louis, MO 63102
TEL: (314) 621-0522
FAX:

ACCREDITED IN ACCORDANCE WITH nelac

NELAP Accredited #100226

RE: Sludge/Water

WorkOrder: 09040048

Dear Tim Bishop:

TEKLAB, INC received 2 samples on 4/1/2009 1:33:00 PM for the analysis presented in the following report.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest as directed on the chain of custody. IL ELAP and NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

Shelly A Hennessy

Shelly A. Hennessy
Project Manager
(618)344-1004 ex 36

TEKLAB, INC.

5445 HORSESHOE LAKE ROAD
COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

Client: Apex Oil Co./Petroleum Fuel & Terminal Co.
Project: Sludge/Water
LabOrder: 09040048
Report Date: 13-Apr-09

CASE NARRATIVE

Cooler Receipt Temp: 13.4 °C

State accreditations:

KS: NELAP #E-10347 | KY: UST #0073 | MO: DNR #00930 | AR: ADEQ #70-028-0

Qualifiers

DF - Dilution Factor	**B** - Analyte detected in the associated Method Blank	**C** - Client requested RL below PQL
RL - Reporting Limit	**J** - Analyte detected below reporting limits	**D** - Diluted out of sample
ND - Not Detected at the Reporting Limit	**R** - RPD outside accepted recovery limits	**E** - Value above quantitation range
Surr - Surrogate Standard added by lab	**S** - Spike Recovery outside accepted recovery limits	**H** - Holding time exceeded
TNTC - Too numerous to count (> 200 CFU)	X - Value exceeds Maximum Contaminant Level	**MI** - Matrix interference
Q - QC criteria failed or noncompliant CCV	# - Unknown hydrocarbon	**DNI** - Did not ignite
NELAP - IL ELAP and NELAP Accredited Field of Testing	**IDPH** - IL Dept. of Public Health	

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ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
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LABORATORY RESULTS

Client: Apex Oil Co./Petroleum Fuel & Terminal Co.
Client Project: Sludge/Water
WorkOrder: 09040048
Client Sample ID: Sludge-1
Lab ID: 09040048-001
Collection Date: 4/1/2009 1:30:00 PM
Report Date: 13-Apr-09
Matrix: SLUDGE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
ASTM D4979-95								
Color		0		**Black**		1	4/1/2009 4:50:00 PM	NJM
Layering		0		**None**		1	4/1/2009 4:50:00 PM	NJM
Odor		0		**Petroleum**		1	4/1/2009 4:50:00 PM	NJM
Physical State		0		**Oil Sludge**		1	4/1/2009 4:50:00 PM	NJM
Turbidity		0		**N/A**		1	4/1/2009 4:50:00 PM	NJM
Viscosity		0		**N/A**		1	4/1/2009 4:50:00 PM	NJM
ASTM D5058-90								
Water Reactivity		0		**None**		1	4/1/2009 4:50:00 PM	NJM
ASTM D5468								
BTU		200		**8370**	BTU/lb	1	4/2/2009 1:00:00 PM	MK
ASTM D92								
Ignitability, Open Cup		60		**> 200**	°F	1	4/9/2009 11:45:00 AM	BSJ
STANDARD METHODS 18TH ED. 2540 G								
Total Solids		0.1		**57.9**	%	1	4/1/2009 7:00:00 PM	MAB
SW-846 1311, 3010A, 6010B, METALS IN TCLP EXTRACT BY ICP								
Arsenic	NELAP	0.250		**< 0.250**	mg/L	1	4/3/2009 1:02:53 PM	LAL
Barium	NELAP	0.0500		**0.0880**	mg/L	1	4/3/2009 1:02:53 PM	LAL
Cadmium	NELAP	0.0200		**< 0.0200**	mg/L	1	4/3/2009 1:02:53 PM	LAL
Chromium	NELAP	0.100		**< 0.100**	mg/L	1	4/3/2009 1:02:53 PM	LAL
Lead	NELAP	0.400		**< 0.400**	mg/L	1	4/3/2009 1:02:53 PM	LAL
Selenium	NELAP	0.500		**< 0.500**	mg/L	1	4/3/2009 1:02:53 PM	LAL
Silver	NELAP	0.100		**< 0.100**	mg/L	1	4/3/2009 1:02:53 PM	LAL
SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS								
2,4,5-Trichlorophenol	NELAP	0.500		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
2,4,6-Trichlorophenol	NELAP	0.500		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
2,4-Dinitrotoluene	NELAP	0.050		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
Cresols, Total	NELAP	0.500	J	**0.071**	mg/L	5	4/6/2009 9:44:00 AM	DMH
Hexachlorobenzene	NELAP	0.050		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
Hexachlorobutadiene	NELAP	0.500		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
Hexachloroethane	NELAP	0.500		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
m,p-Cresol	NELAP	0.500	J	**0.071**	mg/L	5	4/6/2009 9:44:00 AM	DMH
Nitrobenzene	NELAP	0.500		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
o-Cresol	NELAP	0.500		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
Pentachlorophenol	NELAP	1.00		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
Pyridine	NELAP	0.050		**ND**	mg/L	5	4/6/2009 9:44:00 AM	DMH
Surr: 2,4,6-Tribromophenol		27.7-149		**118.7**	%REC	5	4/6/2009 9:44:00 AM	DMH
Surr: 2-Fluorobiphenyl		44.9-116		**99.4**	%REC	5	4/6/2009 9:44:00 AM	DMH
Surr: 2-Fluorophenol		10.6-78.7		**55.7**	%REC	5	4/6/2009 9:44:00 AM	DMH

TEKLAB, INC.

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ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

LABORATORY RESULTS

Client: Apex Oil Co./Petroleum Fuel & Terminal Co.
WorkOrder: 09040048
Lab ID: 09040048-001
Report Date: 13-Apr-09

Client Project: Sludge/Water
Client Sample ID: Sludge-1
Collection Date: 4/1/2009 1:30:00 PM
Matrix: SLUDGE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
SW-846 1311, 3510C, 8270C, SEMI-VOLATILES IN TCLP EXTRACT BY GC/MS								
Surr: Nitrobenzene-d5		41.4-104		**82.0**	%REC	5	4/6/2009 9:44:00 AM	DMH
Surr: Phenol-d5		9.04-52.9		**36.3**	%REC	5	4/6/2009 9:44:00 AM	DMH
Surr: p-Terphenyl-d14		23.5-114		**111.6**	%REC	5	4/6/2009 9:44:00 AM	DMH
SW-846 1311, 5030, 8260B, VOLATILE ORGANIC COMPOUNDS IN TCLP EXTRACT BY GC/MS								
1,1-Dichloroethene	NELAP	0.500		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
1,2-Dichloroethane	NELAP	0.500		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
1,4-Dichlorobenzene	NELAP	0.500		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
2-Butanone	NELAP	5.00		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
Benzene	NELAP	0.200	J	**0.050**	mg/L	100	4/3/2009 12:03:00 AM	CCF
Carbon tetrachloride	NELAP	0.500		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
Chlorobenzene	NELAP	0.500		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
Chloroform	NELAP	0.500		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
Tetrachloroethene	NELAP	0.500		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
Trichloroethene	NELAP	0.500		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
Vinyl chloride	NELAP	0.200		**ND**	mg/L	100	4/3/2009 12:03:00 AM	CCF
Surr: 1,2-Dichloroethane-d4		74.7-129		**100**	%REC	100	4/3/2009 12:03:00 AM	CCF
Surr: 4-Bromofluorobenzene		86-119		**100.9**	%REC	100	4/3/2009 12:03:00 AM	CCF
Surr: Dibromofluoromethane		81.7-123		**100.8**	%REC	100	4/3/2009 12:03:00 AM	CCF
Surr: Toluene-d8		84.3-114		**100**	%REC	100	4/3/2009 12:03:00 AM	CCF
SW-846 1311, 7470A IN TCLP EXTRACT								
Mercury	NELAP	0.00020	J	**0.00007**	mg/L	1	4/7/2009	SRH
SW-846 3550B, 8082, POLYCHLORINATED BIPHENYLS (PCBS) BY GC/ECD								
Aroclor 1016	NELAP	12200		**ND**	µg/Kg	10	4/7/2009 6:15:00 PM	HE
Aroclor 1221	NELAP	12200		**ND**	µg/Kg	10	4/7/2009 6:15:00 PM	HE
Aroclor 1232	NELAP	12200		**ND**	µg/Kg	10	4/7/2009 6:15:00 PM	HE
Aroclor 1242	NELAP	12200		**ND**	µg/Kg	10	4/7/2009 6:15:00 PM	HE
Aroclor 1248	NELAP	12200		**ND**	µg/Kg	10	4/7/2009 6:15:00 PM	HE
Aroclor 1254	NELAP	12200		**ND**	µg/Kg	10	4/7/2009 6:15:00 PM	HE
Aroclor 1260	NELAP	12200		**ND**	µg/Kg	10	4/7/2009 6:15:00 PM	HE
Surr: Decachlorobiphenyl		5-156		**40.2**	%REC	10	4/7/2009 6:15:00 PM	HE
Surr: Tetrachloro-meta-xylene		7.35-123		**41.7**	%REC	10	4/7/2009 6:15:00 PM	HE
SW-846 9010B, 9014								
Cyanide	NELAP	0.49	JS	**0.35**	mg/Kg	1	4/3/2009 1:30:00 PM	NJM
SW-846 9023								
Extractable Organic Halogens (EOX)	NELAP	1.00		**< 1.00**	mg/Kg	1	4/2/2009 11:04:11 AM	BMP
SW-846 9034 (REACTIVE)								
Sulfide, Reactive	NELAP	9.9		**< 9.9**	mg/Kg	1	4/6/2009 6:20:00 PM	LMK
SW-846 9045C								

TEKLAB, INC.

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ENVIRONMENTAL TESTING LABORATORY

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LABORATORY RESULTS

Client: Apex Oil Co./Petroleum Fuel & Terminal Co.
WorkOrder: 09040048
Lab ID: 09040048-001
Report Date: 13-Apr-09

Client Project: Sludge/Water
Client Sample ID: Sludge-1
Collection Date: 4/1/2009 1:30:00 PM
Matrix: SLUDGE

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
SW-846 9045C								
pH (1:1)	NELAP	1.00		**6.10**		1	4/2/2009 11:25:00 AM	HMH
SW-846 9065								
Phenols	NELAP	14.0	S	**40.9**	mg/Kg	5	4/6/2009 10:00:00 AM	NJM
SW-846 9095								
Paint Filter	NELAP	0		**Fail**	Pass/Fail	1	4/1/2009 10:30:00 AM	NJM

Sample Narrative

SW-846 9065

Matrix spike did not recover within control limits because of sample composition.

SW-846 9010B, 9014

Matrix spike did not recover within control limits because of matrix interference.

SW-846 3550B, 8082, PolyChlorinated Biphenyls (PCBs) by GC/ECD

Elevated reporting limit due to sample composition.

SW-846 9023

Matrix spike did not recover within control limits because of matrix interference.

TEKLAB, INC.

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ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
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LABORATORY RESULTS

Client: Apex Oil Co./Petroleum Fuel & Terminal Co.
WorkOrder: 09040048
Lab ID: 09040048-002
Report Date: 13-Apr-09

Client Project: Sludge/Water
Client Sample ID: Water-1
Collection Date: 4/1/2009 1:30:00 PM
Matrix: AQUEOUS

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
EPA 1664A								
Hexane Extractable Material	NELAP	5		**10**	mg/L	1	4/3/2009 5:00:00 PM	HMH
EPA 600 4.1.4, 200.7R4.4, METALS BY ICP (TOTAL)								
Lead	NELAP	0.0400		**< 0.0400**	mg/L	1	4/3/2009 9:50:15 AM	JMW
EPA 600 410.4								
Chemical Oxygen Demand	NELAP	50		**496**	mg/L	1	4/2/2009 10:40:00 AM	HMH
EPA 600 624, VOLATILE ORGANIC COMPOUNDS BY GC/MS								
Benzene	NELAP	2.0	J	**1.3**	µg/L	1	4/3/2009 8:44:00 PM	CCF
Ethylbenzene	NELAP	5.0		**ND**	µg/L	1	4/3/2009 8:44:00 PM	CCF
Toluene	NELAP	5.0	J	**3.3**	µg/L	1	4/3/2009 8:44:00 PM	CCF
Xylenes, Total	NELAP	5.0	J	**1.5**	µg/L	1	4/3/2009 8:44:00 PM	CCF
Surr: 1,2-Dichloroethane-d4		74.7-129		**100.5**	%REC	1	4/3/2009 8:44:00 PM	CCF
Surr: 4-Bromofluorobenzene		86-119		**104.0**	%REC	1	4/3/2009 8:44:00 PM	CCF
Surr: Dibromofluoromethane		81.7-123		**101.6**	%REC	1	4/3/2009 8:44:00 PM	CCF
Surr: Toluene-d8		84.3-114		**98.8**	%REC	1	4/3/2009 8:44:00 PM	CCF
STANDARD METHOD 18TH ED. 4500-H B, LABORATORY ANALYZED								
Lab pH	NELAP	1.00		**7.23**		1	4/1/2009 8:33:00 PM	NJM
STANDARD METHODS 18TH ED. 2540 D								
Total Suspended Solids	NELAP	6		**62**	mg/L	1	4/2/2009 8:00:00 PM	MAB

Sample Narrative

TEKLAB, INC.

5445 HORSESHOE LAKE ROAD
COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

RECEIVING CHECK LIST

Client: Apex Oil Co./Petroleum Fuel & Terminal Co.
Project: Sludge/Water
Lab Order: 09040048
Report Date: 13-Apr-09

Carrier: Rob Nolan

Received By: EAH

Completed by: Erin Clarke
On: 03-Apr-09

Reviewed by: Richard H. Mannz
On: 03-Apr-09

Pages to follow: Chain of custody [2] Extra pages included [0]

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐	Temp °C 13.4
Type of thermal preservation?	None ☐	Ice ☑	Blue Ice ☐	Dry Ice ☐
Chain of custody present?	Yes ☑	No ☐		
Chain of custody signed when relinquished and received?	Yes ☑	No ☐		
Chain of custody agrees with sample labels?	Yes ☑	No ☐		
Samples in proper container/bottle?	Yes ☑	No ☐		
Sample containers intact?	Yes ☑	No ☐		
Sufficient sample volume for indicated test?	Yes ☑	No ☐		
All samples received within holding time?	Yes ☑	No ☐		
Reported field parameters measured:	Field ☐	Lab ☐	NA ☑	
Container/Temp Blank temperature in compliance?	Yes ☑	No ☐		

When thermal preservation is required, samples are compliant with a temperature between 0.1°C - 6.0°C, or when samples are received on ice the same day as collected.

Water - VOA vials have zero headspace?	Yes ☐	No ☐	No VOA vials submitted ☑
Water - pH acceptable upon receipt?	Yes ☑	No ☐	

Any No responses must be detailed below or on the COC.

Custody seal(s) intact on shipping container/cooler. EAH 4/1/09

CHAIN OF CUSTODY

pg. 1 of 2 Work Order # 09040048

TEKLAB, INC.

5445 Horseshoe Lake Road ~ Collinsville, IL 62234 ~ Phone: (618) 344-1004 ~ Fax: (618) 344-1005

Client: Apex Oil Co. / Petroleum Fuel & Terminal Co.
Address: Foot of Mullanphy Street
City / State / Zip: St. Louis, MO 63102
Contact: Tim Bishop Phone: 314/621-0522
E-Mail: tim.pftstl@sbcglobal.net Fax: 314/621-0790

Samples on: ☒ Ice ☐ Blue Ice ☐ No Ice 13.4 °C
Preserved in: ☐ Lab ☒ Field FOR LAB USE ONLY
Lab Notes: Custody seal on cooler. EAH 4/1/09
Comments: Additional Sample rec. 4/3/09 mw

- Are these samples known to be involved in litigation? If yes, a surcharge will apply. ☐ Yes ☒ No
- Are these samples known to be hazardous? ☐ Yes ☒ No
- Are there any required reporting limits to be met on the requested analysis? If yes, please provide limits in comment section. ☐ Yes ☐ No

Project Name / Number | Sample Collector's Name

Results Requested: ☐ Standard ☐ 1-2 Day (100% Surcharge) ☐ Other_____ ☐ 3 Day (50% Surcharge)

Billing Instructions

Lab Use Only	Sample Identification	Date/Time Sampled	# and Type of Containers: UNPRES	HNO_3	NaOH	H_2SO_4	HCL	MeOH	$NaHSO_4$	Other	MATRIX: Water	Drinking Water	Soil	Sludge	Sp. Waste	INDICATE ANALYSIS REQUESTED: BTU & Greensheet	MSD Group 2 Grease & Oil
09040048-001	Sludge-1	4-1-09 1:30	2											X		X	
-002	Water-1	4-1-09 1:30	1	1		1	2				X						X

Relinquished By	Date / Time	Received By	Date / Time
Rob Nolan	4/1/09 1333	Elizabeth Arthurley	4/1/09 1333

ATTACHMENT 7 Page 8 of 9

The individual signing this agreement on behalf of client acknowledges that he/she has read and understands the terms and conditions of this agreement, on the reverse side, and that he/she has the authority to sign on behalf of client.

WHITE & YELLOW – LAB PINK – SAMPLER'S COPY

CHAIN OF CUSTODY

pg. 2 of 2 Work Order # 0904oo48

TEKLAB, INC. 5445 Horseshoe Lake Road ~ Collinsville, IL 62234 ~ Phone: (618) 344-1004 ~ Fax: (618) 344-1005

Client: Apex Oil Company / Petroleum Fuel & Terminal Co.
Address: Foot of Mullanphy Street
City / State / Zip: St. Louis, MO 63102
Contact: Tim Bishop Phone: 314/621-0522
E-Mail: tim.pftstl@sbcglobal.net Fax: 314/621-0790

Samples on: ☒ Ice ☐ Blue Ice ☐ No Ice 11.4 °C
Preserved in: ☐ Lab ☒ Field FOR LAB USE ONLY
Lab Notes:

Comments: Additional sample ... received 0904oo48 EDC 4/3/09

- Are these samples known to be involved in litigation? If yes, a surcharge will apply. ☐ Yes ☐ No
- Are these samples known to be hazardous? ☐ Yes ☐ No
- Are there any required reporting limits to be met on the requested analysis? If yes, please provide limits in comment section. ☐ Yes ☐ No

Project Name / Number

Sample Collector's Name: Tim Bishop

Results Requested ☐ Standard ☐ 1-2 Day (100% Surcharge) ☐ Other_____ ☐ 3 Day (50% Surcharge)

Billing Instructions

Lab Use Only	Sample Identification	Date/Time Sampled	# and Type of Containers: UNPRES	HNO_3	NaOH	H_2SO_4	HCL	MeOH	$NaHSO_4$	Other	MATRIX: Water	Drinking Water	Soil	Sludge	Sp. Waste	INDICATE ANALYSIS REQUESTED: MSD Group 2 + Oil & Grease
0904oo48-002	Water	4/3/09 11:30am				1	2									

Relinquished By	Date / Time	Received By	Date / Time
Ron Collins		Marvin L Sterling II	4/3/09 1241

ATTACHMENT 7 Page 9 of 9

The individual signing this agreement on behalf of client acknowledges that he/she has read and understands the terms and conditions of this agreement, on the reverse side, and that he/she has the authority to sign on behalf of client.

WHITE & YELLOW – LAB PINK – SAMPLER'S COPY

signed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

1. Generator ID Number	2. Page 1 of 1	3. Emergency Response Phone	4. Manifest Tracking Number
		(800)326-1221	000275008WAS

5. Generator's Name and Mailing Address
PETROLEUM FUEL AND TERMINAL COMPANY
FOOT OF MULLANPHY STREET
ST. LOUIS, MO 63102
Generator's Phone: (314)621-0522

Generator's Site Address (if different than mailing address)
PETROLEUM FUEL AND TERMINAL COMPANY
FOOT OF MULLANPHY STREET
ST. LOUIS, MO 63102
GEN: 123687

6. Transporter 1 Company Name — U.S. EPA ID Number
MIDWEST SANITARY SERVICES — ILD053980272

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address — U.S. EPA ID Number
ALLIED ROXANA LANDFILL
4600 CAHOKIA CREEK RD
ROXANA, IL 62084
Facility's Phone: (618)656-6912

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON DOT / Non. RCRA Regulated Material	1	CM	20	P	None
	2. @ 299 11:00			590		
	3.					
	4.					

14. Special Handling Instructions and Additional Information
3384972211

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Clay Brueggeman On Behalf of Tim Bishop — Signature: Clay Brueggeman — Month: 10 Day: 12 Year: 09

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Dave Evans — Signature: Dave Evans — Month: 10 Day: 27 Year: 09

Transporter 2 Printed/Typed Name — Signature — Month — Day — Year

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month — Day — Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Neal Hunter — Signature — Month — Day — Year

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

ATTACHMENT 8 Page 1 of 2

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	1	(800)326-1221	000207116WAS

GENERATOR

5. Generator's Name and Mailing Address

PETROLEUM FUEL AND TERMINAL COMPANY / TIM BIS
FOOT OF MULLANPHY STREET
ST. LOUIS, MO 63102
Generator's Phone: (314)621-0522

Generator's Site Address (if different than mailing address)

PETROLEUM FUEL AND TERMINAL COMPANY / TIM
FOOT OF MULLANPHY STREET
ST. LOUIS, MO 63102
GEN: 123687

6. Transporter 1 Company Name: MIDWEST SANITARY SERVICES — U.S. EPA ID Number: ILD053980272

7. Transporter 2 Company Name — U.S. EPA ID Number

8. Designated Facility Name and Site Address

ALLIED ROXANA LANDFILL
4600 CAHOKIA CREEK RD
ROXANA, IL 62084
Facility's Phone: (618)656-6912

U.S. EPA ID Number

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-DOT/NON-RCRA REGULATED	001	CM	3500	GAL	
	2. 853620 21660			10.83		
	3.					
	4.					

14. Special Handling Instructions and Additional Information

1.338Y97221_T#2056345

[129483S]G

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Tim Bishop — Signature: Tim Bishop — Month 07 Day 28 Year 09

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:

Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Jeff EVANS — Signature: Jeff Evans — Month 07 Day 28 Year 09

Transporter 2 Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Lori Kohn — Signature: Lori Kohn — Month 7 Day 28 Year 09

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

Received From: Energy Petroleum Co. 7/25/00

0060

MINERAL SPIRITS PRODUCT CODE: R00000010700

1. CHEMICAL PRODUCT AND COMPANY INFORMATION

REVISION DATE: 05/30/1997
UN NUMBER- UN1268

PRIMARY APPLICATION- CHEMICAL INTERMEDIATE

MANUFACTURER- SUN COMPANY, INC.
TEN PENN CENTER
1801 MARKET STREET
PHILADELPHIA PA 19103-1699

SYNONYMS.....: STODDARD SOLVENT
CAS REGISTRY NO: 8052-41-3
CAS NAME.....: STODDARD SOLVENT
CHEMICAL FAMILY: PETROLEUM HYDROCARBON
INFORMATION
SUPPLIER... JOANNE HOUCK
PHONE.....: (610) 859-1120

EMERGENCY PHONE NUMBERS (AFTER NORMAL BUSINESS HOURS)
SUN CO. 1-800-964-8861
CHEMTREC 1-800-424-9300

2. COMPOSITION / INFORMATION ON INGREDIENTS

COMPONENT/CAS NO.	LO%	HI%	EXPOSURE GUIDELINES OSHA TWA	OSHA STEL	ACGIH TWA	ACGIH STEL	SUN/MFR TWA	SUN/MFR STEL	UNIT
LIMITS FOR THE PRODUCT:					NO SPECIFIC LIMIT				
STODDARD SOLVENT 8052-41-3	.00	100.0	100		100				PPM
1,2,4-TRIMETHYLBENZENE 95-63-6	.00	5.00	25		25				PPM
1,3,5-TRIMETHYLBENZENE 108-67-8	.00	5.00	25		25				PPM

ADDITIONAL EXPOSURE LIMITS ---------- SUN RECOMMENDATION
8 HR. TIME WEIGHTED PERMISSIBLE EXPOSURE- 100 PPM 300 MG/M3

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW ----------

DANGER! COMBUSTIBLE LIQUID AND VAPOR. MAY CAUSE SKIN IRRITATION. PULMONARY ASPIRATION HAZARD-CAN ENTER LUNGS AND CAUSE DAMAGE.

APPEARANCE-- CLEAR LIQUID. ODOR-- SOLVENT ODOR.

POTENTIAL HEALTH EFFECTS ----------

PRIMARY ROUTES OF ENTRY- INHALATION(X) SKIN(X) EYE(X) INGESTION( )

INHALATION ----------
LC50 IN RATS IS: > 5500 MG/M3, TIME 4 HRS. EXCESSIVE EXPOSURES MAY CAUSE IRRITATION TO EYES, NOSE, THROAT AND LUNGS. CENTRAL NERVOUS SYSTEM EFFECTS; DIZZINESS, LOSS OF BALANCE AND COORDINATION; UNCONSCIOUSNESS, COMA; RESPIRATORY FAILURE AND DEATH.

SKIN ----------
PRACTICALLY NON-TOXIC IF ABSORBED (LD50 GREATER THAN 2000 MG/KG). MAY CAUSE MODERATE IRRITATION WITH PROLONGED OR REPEATED CONTACT. REMOVES NATURAL OILS & FATS FROM SKIN. DRAIZE SKIN IRRITATION SCORE IS: 4.5 OUT OF 8.0. DERMAL LD50 IN RABBITS IS: > 3,000 MG/KG.

EYE ----------

CONTACT WITH THE EYE MAY CAUSE MINIMAL IRRITATION. DRAIZE EYE IRRITATION SCORES ARE: SEE SECTION 11 - ACUTE TOXICITY

INGESTION ----------
ORAL LD50 IN RATS IS: > 5 G/KG. HARMFUL OR FATAL IF SWALLOWED. PULMONARY ASPIRATION HAZARD IF SWALLOWED AND/OR VOMITING OCCURS - CAN ENTER LUNGS AND CAUSE DAMAGE.

CARCINOGEN LISTED BY-IARC(NO) NTP(NO) OSHA(NO) ACGIH(NO) OTHER(NO)

PRE-EXISTING MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE-
DISORDERS OR DISEASES OF THE SKIN, EYE, LIVER, KIDNEY, NERVOUS SYSTEM, RESPIRATORY AND/OR PULMONARY SYSTEM, LUNG (E.G. ASTHMA-LIKE CONDITIONS).

4. FIRST AID MEASURES

INHALATION ----------
MOVE PERSON TO FRESH AIR. IF NOT BREATHING, GIVE ARTIFICIAL RESPIRATION, OBTAIN MEDICAL ASSISTANCE.

SKIN ----------
WASH WITH SOAP AND WATER UNTIL NO ODOR REMAINS. IF REDNESS OR SWELLING DEVELOPS, OBTAIN MEDICAL ASSISTANCE. WASH CLOTHING BEFORE REUSE.

EYE ----------
FLUSH WITH WATER FOR AT LEAST 15 MINUTES. IF IRRITATION PERSISTS, OBTAIN MEDICAL ASSISTANCE.

INGESTION ----------
DO NOT INDUCE VOMITING! DO NOT GIVE LIQUIDS! OBTAIN EMERGENCY MEDICAL ATTENTION. SMALL AMOUNTS WHICH ACCIDENTALLY ENTER MOUTH SHOULD BE RINSED OUT UNTIL TASTE OF IT IS GONE.

5. FIRE FIGHTING MEASURES

FLASH POINT: 105 MINIMUM TCC (DEG. F); 40.5 MIN TCC (DEG. C)
AUTOIGNITION TEMP.: 540 ESTIMATED (DEG. F); 282 ESTIMATED (DEG. C)

---FLAMMABLE LIMITS IN AIR---
LOWER EXPLOSIVE LIMIT (LEL): ESTIMATED 0.8 % VOLUME
UPPER EXPLOSIVE LIMIT (UEL): ESTIMATED 5.0 % VOLUME

FIRE AND EXPLOSION HAZARDS ----------
COMBUSTIBLE (FLASH POINT 100 TO 200F)

EXTINGUISHING-MEDIA ----------
WATER SPRAY. REGULAR FOAM. DRY CHEMICAL. CARBON DIOXIDE.

SPECIAL FIRE FIGHTING INSTRUCTIONS ---------
COOL TANK/ CONTAINER. WEAR SELF-CONTAINED BREATHING APPARATUS. WEAR STRUCTURAL FIREFIGHTERS PROTECTIVE CLOTHING.

NFPA/HMIS CLASSIFICATION
HEALTH - 1 / 1
FIRE - 2 / 2
REACTIVITY - 0 / 0
PERSONAL PROTECTION INDEX - X

HAZARD RATING
0=LEAST 1=SLIGHT
2=MODERATE 3=HIGH
4=EXTREME

SPECIFIC HAZARD: COMBUSTIBLE LIQUID

6. ACCIDENTAL RELEASE MEASURES

PREVENT IGNITION; STOP LEAK; VENTILATE AREA. CONTAIN SPILL. WEAR RESPIRATORY PROTECTION FOR LARGE SPILL, LEAK OR RELEASE. USE PERSONAL PROTECTIVE EQUIPMENT STATED IN SECTION 8. ADVISE EPA; STATE AGENCY IF REQUIRED. ABSORB ON INERT MATERIAL. SHOVEL, SWEEP OR VACUUM SPILL.

7. HANDLING AND STORAGE

KEEP AWAY FROM HEAT, SPARKS AND FLAME. KEEP CONTAINER TIGHTLY CLOSED. NFPA CLASS II STORAGE. TRANSFER OPERATIONS MUST BE ELECTRICALLY GROUNDED TO DISSIPATE STATIC BUILDUP. WASH THOROUGHLY AFTER HANDLING. NEVER SIPHON BY MOUTH.

8. EXPOSURE CONTROL / PERSONAL PROTECTION

CONSULT WITH A HEALTH/SAFETY PROFESSIONAL FOR SPECIFIC SELECTION.

VENTILATION ----------
USE ONLY WITH ADEQUATE VENTILATION. VENTILATE AS NEEDED TO COMPLY WITH EXPOSURE LIMIT.

PERSONAL PROTECTIVE EQUIPMENT ----------
EYE ----------
SPLASH PROOF CHEMICAL GOGGLES OR FULL FACE SHIELD RECOMMENDED TO PROTECT AGAINST SPLASH OF PRODUCT.

GLOVES ----------
PROTECTIVE GLOVES RECOMMENDED WHEN PROLONGED SKIN CONTACT CANNOT BE AVOIDED. THE FOLLOWING GLOVE MATERIALS ARE ACCEPTABLE: POLYETHYLENE; NEOPRENE; NITRILE; POLYVINYL ALCOHOL; VITON;

RESPIRATOR ----------
CONCENTRATION-IN-AIR DETERMINES PROTECTION NEEDED. USE ONLY NIOSH CERTIFIED RESPIRATORY PROTECTION. HALF-MASK AIR PURIFYING RESPIRATOR WITH ORGANIC VAPOR CARTRIDGES IS ACCEPTABLE TO 10 TIMES THE EXPOSURE LIMIT. FULL-FACE AIR PURIFYING RESPIRATOR WITH ORGANIC VAPOR CARTRIDGES IS ACCEPTABLE TO 50 TIMES THE EXPOSURE LIMIT NOT TO EXCEED THE CARTRIDGE LIMIT OF 1000 PPM. PROTECTION BY AIR PURIFYING RESPIRATORS IS LIMITED. USE A POSITIVE PRESSURE-DEMAND FULL-FACE SUPPLIED AIR RESPIRATOR OR SCBA FOR EXPOSURES ABOVE 50X THE EXPOSURE LIMIT. IF EXPOSURE IS ABOVE IDLH(IMMEDIATELY DANGEROUS TO LIFE & HEALTH) OR THERE IS THE POSSIBILITY OF AN UNCONTROLLED RELEASE OR EXPOSURE LEVELS ARE UNKNOWN THEN USE A POSITIVE PRESSURE-DEMAND FULL-FACE SUPPLIED AIR RESPIRATOR WITH ESCAPE BOTTLE OR SCBA.

OTHER ----------
IF CONTACT IS UNAVOIDABLE, WEAR CHEMICAL RESISTANT CLOTHING. THE FOLLOWING MATERIALS ARE ACCEPTABLE AS PROTECTIVE CLOTHING MATERIALS: POLYVINYL ALCOHOL(PVA); NEOPRENE; NITRILE; VITON; POLYURETHANE; SAFETY SHOWER AND EYE WASH AVAILABILITY RECOMMENDED. LAUNDER SOILED CLOTHES. FOR NON-FIRE EMERGENCIES, POSITIVE PRESSURE SELF-CONTAINED BREATHING APPARATUS (SCBA) & STRUCTURAL FIREFIGHTERS' PROTECTIVE CLOTHING WILL PROVIDE LIMITED PROTECTION.

9. PHYSICAL AND CHEMICAL PROPERTIES

BOILING POINT.....	300 TO 390 (DEG. F)	149 TO 199	(DEG. C)
MELTING POINT.....	N/A (DEG. F)	N/A	(DEG. C)
SPECIFIC GRAVITY....	0.79 (WATER=1)		
PACKING DENSITY.....	N/A (KG/M3)		
VAPOR PRESSURE.....	6 (MM HG @ 41 DEG C)		
VAPOR DENSITY.....	3.9 (AIR=1)		
SOLUBILITY IN WATER.	NIL (% BY VOLUME)		
PH INFORMATION.....	N/A AT CONC. N/A G/L H2O		
% VOLATILES BY VOL..	100		
EVAPORATION RATE....	40X SLOWER (ETHYL ETHER=1)		
OCTANOL/WATER COEFF.	N.D.		
APPEARANCE.....	CLEAR LIQUID.		
ODOR.....	SOLVENT ODOR.		
ODOR THRESHOLD.....	N.D. (PPM)		
VISCOSITY.....	N/A SUS @ N/A DEG F ... N/A CST @ N/A DEG C		
MOLECULAR WEIGHT...	N/A (G/MOLE)		

N/A = NOT APPLICABLE N.D. = NO DATA / NOT DETERMINED

10. STABILITY AND REACTIVITY

STABILITY ----------------------------------
STABLE.
INCOMPATIBLE MATERIALS ---------------------
STRONG OXIDIZERS
HAZARDOUS DECOMPOSITION --------------------
COMBUSTION WILL PRODUCE CARBON MONOXIDE AND ASPHYXIANTS
POLYMERIZATION -----------------------------
WILL NOT OCCUR.

11. TOXICOLOGICAL INFORMATION

FOR THE PRODUCT ------------
ACUTE TOXICITY
LC50 IN RATS IS: > 5500 MG/M3, TIME 4 HRS. DRAIZE SKIN IRRITATION SCORE IS: 4.5 OUT OF 8.0. DERMAL LD50 IN RABBITS IS: > 3,000 MG/KG. DRAIZE EYE IRRITATION SCORES ARE: 1.0 0.0 0.0 0.0 OUT OF 110.0 AT 24 48 72 168 HOURS. ORAL LD50 IN RATS IS: > 5 G/KG.

INHALATION: OVEREXPOSURE TO MIST OR VAPORS MAY CAUSE EYE, NOSE, THROAT AND RESPIRATORY TRACT IRRITATION, CENTRAL NERVOUS SYSTEM (BRAIN) EFFECTS, DIZZINESS, LOSS OF BALANCE AND COORDINATION, UNCONSCIOUSNESS, COMA, RESPIRATORY FAILURE, DEATH. SKIN: PRACTICALLY NON-TOXIC IF ABSORBED. PROLONGED OR REPEATED CONTACT MAY CAUSE MODERATE IRRITATION. EYE: MINIMAL IRRITATION ON CONTACT. ORAL: HARMFUL OR FATAL IF SWALLOWED AND/OR VOMITING OCCURS BECAUSE IT CAN ENTER THE LUNGS AND CAUSE DAMAGE--PULMONARY ASPIRATION HAZARD.

STODDARD SOLVENT (COMPONENT)
INHALATION: OVEREXPOSURE TO MIST OR VAPOR MAY CAUSE IRRITATION TO EYE, NOSE, THROAT, RESPIRATORY TRACT, CNS (BRAIN) EFFECTS, DIZZINESS. GROSS OVEREXPOSURE MAY CAUSE TREMOR, CONVULSIONS, UNCONSCIOUSNESS, RESPIRATORY FAILURE, DEATH. SKIN: PROLONGED/REPEATED CONTACT MAY CAUSE IRRITATION & DERMATITIS. EYE: MINIMALLY IRRITATING ON CONTACT. INGESTION: LOW ACUTE TOXICITY. PULMONARY ASPIRATION HAZARD - HARMFUL OR FATAL IF SWALLOWED AND/OR VOMITING OCCURS BECAUSE IT CAN ENTER THE LUNGS AND CAUSE DAMAGE.

1,2,4-TRIMETHYLBENZENE (COMPONENT)
INHALATION: MODERATELY TOXIC. VAPOR OR MIST IRRITATES THE EYES, MUCOUS MEMBRANES, RESPIRATORY TRACT. OVEREXPOSURE MAY CAUSE CENTRAL NERVOUS SYTEM (BRAIN) EFFECTS, NARCOTIC EFFECTS, NAUSEA, HEADACHE, DIZZINESS, INCOORDINATION, UNCONSCIOUSNESS, COMA, DEATH. SKIN: CAN BE ABSORBED. CONTACT MAY CAUSE IRRITATION AND DERMATITIS. EYE: IRRITATING INGESTION: MODERATELY TOXIC. SYMPTOMS SIMILAR TO INHALATION. HARMFUL OR FATAL IF SWALLOWED. PULMONARY ASPIRATION HAZARD- HARMFUL OR FATAL BECAUSE IT CAN ENTER THE LUNGS AND CAUSE DAMAGE.

1,3,5-TRIMETHYLBENZENE (COMPONENT)
INHALATION: VAPOR HARMFUL! OVEREXPOSURE MAY CAUSE EYE, NOSE, THROAT, & RESPIRATORY TRACT IRRITATION, CENTRAL NERVOUS SYSTEM (BRAIN) EFFECTS, HEADACHE, NAUSEA, DROWSINESS, PERIPHERAL NERVE DAMAGE, INCOORDINATION, UNCONSCIOUSNESS, COMA, OR DEATH. SKIN: MILD TO MODERATE IRRITATION WITH PROLONGED OR REPEATED CONTACT. EYE: MILD TO MODERATE IRRITATION. ORAL: HARMFUL OR FATAL IF SWALLOWED. PULMONARY ASPIRATION HAZARD IF SWALLOWED AND/OR VOMITING OCCURS- CAN ENTER THE LUNGS AND CAUSE DAMAGE

12. ECOLOGICAL INFORMATION

AQUATIC TOXICITY ---------------------------

NO DATA AVAILABLE

N/A = NOT APPLICABLE N.D. = NO DATA / NOT DETERMINED

13. DISPOSAL CONSIDERATIONS

FOLLOW FEDERAL, STATE AND LOCAL REGULATIONS. RCRA HAZARDOUS WASTE. DO NOT FLUSH TO DRAIN/ STORM SEWER. CONTRACT TO AUTHORIZED DISPOSAL SERVICE.

14. TRANSPORTATION INFORMATION

DOT-
PROPER SHIPPING NAME- PETROLEUM DISTILLATES, N.O.S. (MINERAL SPIRITS)
HAZARD CLASS- 3 (FLAMMABLE LIQUID)
IDENTIFICATION NUMBER- UN1268
LABEL REQUIRED- PG III

IMDG- PROPER SHIPPING NAME- NO DATA AVAILABLE

IATA- PROPER SHIPPING NAME- NO DATA AVAILABLE

15. REGULATORY INFORMATION

SARA 302 THRESHOLD PLANNING QUANTITY. N/A

SARA 304 REPORTABLE QUANTITY ..... N/A

SARA 311 CATEGORIES- IMMEDIATE (ACUTE) HEALTH EFFECTS.. Y
DELAYED (CHRONIC) HEALTH EFFECTS.. N
FIRE HAZARD ..... Y
SUDDEN RELEASE OF PRESSURE HAZARD. N
REACTIVITY HAZARD ..... N

WHEN A PRODUCT AND/OR COMPONENT IS LISTED BELOW, THE REGULATORY LIST ON WHICH IT APPEARS IS INDICATED.

FOR THE PRODUCT - FL MA MN NJ PA
STODDARD SOLVENT - MA NJ PA RI
1,2,4-TRIMETHYLBENZENE - MA NJ PA 01
1,3,5-TRIMETHYLBENZENE - MA NJ RI

01=SARA 311	02=SARA 302/304	03=IARC CARCINOGEN
04=OSHA CARCINOGEN	05=ACGIH CARCINOGEN	06=NTP CARCINOGEN
07=CERCLA 302.4	08=WHMIS CONTROLLED PROD.	
10=OTHER CARCINOGEN		
PA=PENNSYLVANIA RTK	NJ=NEW JERSEY RTK	CA=CALIFORNIA PROP 65
MA=MASSACHUSETTS RTK	MI=MICHIGAN 406	MN=MINNESOTA RTK
FL=FLORIDA	RI=RHODE ISLAND	IL=ILLINOIS
NY=NEW YORK	WV=WEST VIRGINIA	CT=CONNECTICUT
LA=LOUISIANA	ME=MAINE	OH=OHIO

THIS PRODUCT OR ALL COMPONENTS OF THIS PRODUCT ARE LISTED ON THE U.S. TSCA INVENTORY.

16. OTHER INFORMATION

CAUTION! COMBUSTIBLE. DANGER! HARMFUL OR FATAL IF SWALLOWED. KEEP AWAY FROM HEAT AND OPEN FLAME. KEEP CONTAINER CLOSED. USE ONLY WITH ADEQUATE VENTILATION. AVOID PROLONGED OR REPEATED CONTACT WITH SKIN. AVOID PROLONGED BREATHING OF MIST OR VAPOR. IF SWALLOWED, DO NOT INDUCE VOMITING. CALL PHYSICIAN IMMEDIATELY. "HAZARDOUS WHEN EMPTY" PICTORAL DRUM LABEL. WHMIS CLASSIFICATION: CLASS B; DIVISION 3. TDG CLASS 3.3 FLAMMABLE LIQUID III.

N/A = NOT APPLICABLE N.D. = NO DATA / NOT DETERMINED

Appendix 1-1

DATA GATHERING WORKSHEET AND CHECKLIST INSTRUCTIONS AND KEY

1. Complete all items on the applicable data gathering worksheet and checklist in a neat and legible fashion.

2. All responses will be based on the inspector's knowledge and best judgement and information obtained from facility the representative(s) at the time of the inspection.

3. A (✓) mark should be used to mark the all boxes (☐) and will indicate the choice made or the action completed.

4. The Records Review Worksheet and Checklists and the Visual Review Worksheet and Checklists each have a key below the tables. Use this key when filling out these forms.

a. Items which are shaded gray on the worksheets and checklists are considered high priority items during inspections and should always be completed.

b. On the top of the worksheets and checklists are a group of boxes which represent the generator status of the facility and whether or not the facility is subject to interim status or permit requirements. The appropriate box should be checked.

5. The inspector should pay special attention to the questions contained in this box and make sure that they are able to answer them as relates to inspection documentation.

DOCUMENTATION: ***HOW*** are the facts known? ***WHO*** said what? ***WHEN*** did it happen? ***HOW*** *long did it happen?* and ***WHAT PROOF WAS OBTAINED?***

6. Each of the forms has a space at the bottom to indicate the Attachment number and page when the form is included in the report. The attachment number and page should be used when referencing information contained on the form in the inspection report.

Appendix 1-2

PRE-INSPECTION ITEMS TO CHECK

General Equipment:	- hardhat	- rubber boots	- safety shoes
	- safety glasses	- tape measure	- back-up camera
	- camera	- notebook	- flashlight
	- calculator	- compass	- binoculars
	- GPS unit	- tape recorder	- pens/markers
	- post-its	- safety gloves	- winter gloves
	- coveralls	- safety boots	- ear plugs
	- film	- ice chest	- coat
	- pH paper	- batteries	- respirator

Special Equipment?: _____

_____

Paperwork:	- NOV, CBI & Rec. for Doc. forms	- Notification forms	- Multi-Media form
	- Reference Information	- Regulations (Federal/State)	- Facility Files
	- Data Collection Worksheets		
Items Needed:	- Load Camera	- Credentials	- Daily Planner
	- Change Phone Message	- Car Book/Keys/Credit Card	- Business Cards
	- Change Phone Message	- Sign-out On Board Considerations?	- Special Health or Safety

Notes: _____

_____

Appendix 1-3

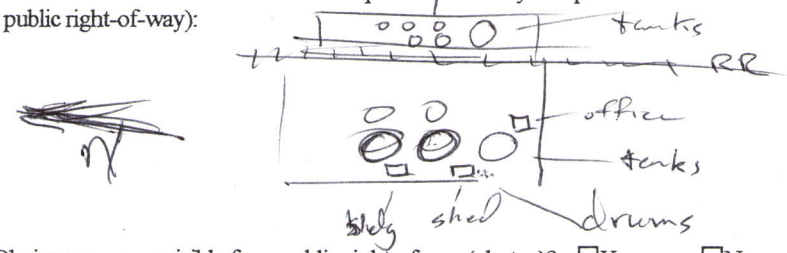
Facility: Centro Point Terminals Date: 8/25/10 Arrival time: 10:30am

DRIVE-BY

1. Drive-by conducted from public right-of-way? ☑Yes ☐No

Jclack 1 Miss. R.

2. Determine the direction "North" with respect to the facility and provide a brief sketch of the layout and orientation (as can be viewed from the public right-of-way):



3. Obvious concerns visible from public right-of-way (photos)? ☑Yes ☐No

- Containers drums	- Tanks	maybe - Processing Equipment	- Loading Areas
- Unloading Areas	- Security Devices	- Open Drums	- Stressed Vegetation
-Unusual Staining	- Unusual Odors	- Obvious Discharges	- Improper Disposal
- Safety Concerns	- Other Concerns		

Appendix 1-4 SITE ENTRY AND INBRIEFING

1. ☑Used main entrance ☑Entered during normal operating hours ☐Excessive delays (>15 minutes - denial of access?) - ☑No

2. Facility Representative(s): Tim Bishop Title: Terminal Mgr.

_____ Title: _____

_____ Title: _____

3. Does representative have intimate knowledge of all waste management practices? ☑Yes ☐No

How long in position? ~15 yr.

4. Introduction:

- ☑Presented credentials
- ☑Explained responsibility to provide accurate information and provided copies of Section 1001 and 1002 U.S.C. to facility
- ☑Verified presence at correct facility (checked address/I.D. #)
- ☑Explained authority to conduct inspection (Section 3007 of RCRA)
- ☑Explained the purpose, scope, and order of the inspection
- ☑Completed Multimedia screening checklist
- ☑Explained documentation process - worksheets, checklists, photos, notes, statements, etc
- ☑Provided SBRFA
- ☑Obtained GPS reading
- ☑Explained facility's right to claim CBI

5. Was full access granted? ☑Yes ☑By facility representative or Other (name): _____

☐No - Access denied. Name of person denying access: _____

Time of denial: _____

Reason for denial, or limitations placed on access:

Appendix 1-5 FACILITY BACKGROUND WORKSHEET

1. Site History:

Date facility began operating: originally 1903 Number of employees: 7

Number of shifts/hour worked: 24 hpd Number of days worked per week: 5 dpw

Size (sq. ft., how divided): ~ 7 acres, one small office bldg, one shop, one shed, one small boiler (heater) bldg.

Property owner and facility operator the same? ☐Yes ☐No

2. Major products or services provided: liquid asphalt dist. got out of residual fuels ~3yrs ago (#2 & #6 fuel oil)

3. Major raw materials used: store liquid asphalt in tanks

4. Major manufacturing or processing operations which generate waste streams: (provide brief description)

Operation/Process	Waste Stream(s)
dist of liquid asphalt	
maint.	used oil – put into residual fuel tanks
	parts washer – solvent added to used oil
	batteries – returned for core charge
	spent lamps

5. Complete a Generator Waste Stream Worksheet and /or Off-Site Waste Stream Worksheet for the waste streams noted above and then finish this form.

6. Verified/compared above information with facility Notification Form: ☑Yes ☐No

7. **GENERATOR STATUS:** (based on records review)

☐Non-generator
☑CE (0-100kg/mo or 1 kg/mo acute waste and accumulate <1000 kg or 1kg acute waste or 100 kg of acute spill residue)
☐SQG (100-1000kg/mo and accumulate<6000kg)
☐LQG (>1000kg/mo)

Is facility's status solidly within above category? ☐Yes ☐No
(If not carefully verify status and document)

8. **TSD STATUS**: ☐Treatment ☐Storage ☐Disposal

Note: Types of units, number of units, capacities, processes, etc:

N/A

9. Resolved questions from Pre-Inspection Worksheet? ☐Yes ☐No ☐No Questions

10. Resolved compliance officer's questions from Pre-Inspection Worksheet? ☐Yes ☐No ☑No Questions

11. Requested site map or diagram to identify all observations? ☑Yes ☐None Available

Appendix 1-6 GENERATOR WASTE STREAM WORKSHEET

1. **WASTE STREAM:** larger old tank cleaned ~1yr ago, which contained #6 fuel oil
   FACILITY DETERMINATION: ☐Hazardous ☑Non-hazardous ☐Not done ☐Inadequate
   WASTE CODES: _____
   DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☑Testing
   Documentation: _____
   GENERATING PROCESS: tank clean out
   GENERATION RATE: 13 roll offs ~20 yd³ ea July-Oct 2009
   ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected
   OFF-SITE MANAGEMENT/DISPOSITION: Roxanna Landfill, IL

2. **WASTE STREAM:** parts washer solvent
   FACILITY DETERMINATION: ☐Hazardous ☐Non-hazardous ☐Not done ☐Inadequate
   WASTE CODES: _____
   DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing
   Documentation: MSDS Stoddard solvent 105°F fp & trimethy benzene maybe
   GENERATING PROCESS: _____
   GENERATION RATE: 10 gal/yr
   ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected
   put into tank w used oil
   OFF-SITE MANAGEMENT/DISPOSITION: used oil added to residual fuel (#6 bunker)

3. **WASTE STREAM:** spent lamps
   FACILITY DETERMINATION: ☐Hazardous ☐Non-hazardous ☑Not done ☐Inadequate
   WASTE CODES: Bishop said he didn't know if they all contain Hg
   DETERMINATION METHOD: ☐Product knowledge ☐Process knowledge ☐Testing
   Documentation: _____
   GENERATING PROCESS: _____
   GENERATION RATE: 10/yr fluorescent 5/yr HID - per phone conversation w Bishop on 8/31/10 qty not known at time of CEI.
   ON-SITE MANAGEMENT: Satellites ☐Visually inspected Storage ☐Visually inspected
   OFF-SITE MANAGEMENT/DISPOSITION: disposed with general trash - qty not known by Bishop
   Bishop said person who knows is gone today.

J. USED OIL – RCRA INSPECTION CHECKLIST generator

1. What Used Oil activities does the facility engage in? lube & hydraulic equip maintenance including 3 pick up trucks

   a. Type of used oil generated? _____
   b. Amount of used oil generated? 40-50 gal/yr.

40 CFR 279.12 Prohibition Questions

1. Is used oil being managed only in a surface impoundment or waste pile subject to regulation under 40 CFR Parts 264 or 265? ☐ Yes ☐ No ☑ Not Applicable (NA)
2. Is used oil being used as a dust suppressant? ☐ Yes ☑ No
3. Is off-specification oil fuel burned for energy recovery in only industrial furnaces, industrial boilers, utility boilers, used oil-fired space heaters, or hazardous waste incinerators identified in 40 CFR Part 279.12 (c)(1-3)? ☐ Yes ☐ No

Subpart C – Standards for Used Oil Generators

(Check here ☐ if this section is NA)

Instructions: *Fill out this section if the facility generates used oil or if facility activities first caused the used oil to become subject to regulation (see definition and applicability of used oil generator in 40 CFR 279.20). Used oil generators are subject to all applicable Spill Prevention, Control and Countermeasures (SPCC) requirements (40 CFR Part 112) and underground storage tank standards (40 CFR Part 280) in addition to the requirements of Subpart C.*

Regulation and Standard		*Violations*
279.21 Hazardous Waste Mixing		
1. Is the generator mixing hazardous waste with used oil?	☑ Yes ☐ No ☐ NA	
If yes, is the generator of a used oil containing greater than 1,000 parts per million (ppm) total halogens managing the used oil as a hazardous waste unless the used oil presumption is rebutted?	☐ Yes ☑ No ☐ NA	
2. Are analytical data available?	☐ Yes ☐ No ☐ NA	MSDS
279.22 Used Oil Storage		above ground tanks
1. Does the generator only store used oil in tanks, containers, or units subject to regulation under 40 CFR Parts 264 or 265?	☑ Yes ☐ No ☐ NA	~~1 tank~~ 2 tanks ~ 900 gal cap. about 4" in bottom, maybe 50 gal
2. Are containers and aboveground tanks used by a generator to store used oil in good condition, with no visible leaks?	☑ Yes ☐ No ☐ NA	
3. Are containers, aboveground tanks, and fill pipes used for underground tanks labeled or marked "Used Oil"?	☐ Yes ☑ No ☐ NA	not marked
4. Upon detection of a release of used oil, has the generator		no releases known
a. Stopped the release?	☐ Yes ☐ No ☑ NA	
b. Contained the release?	☐ Yes ☐ No ☑ NA	
c. Cleaned up and managed the used oil and other materials?	☐ Yes ☐ No ☑ NA	
d. Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	☐ Yes ☐ No ☐ NA	
279.23 Used Oil Storage		
1. Is the generator burning used oil in used oil fired space heaters only when		
a. The heater burns only used oil that the owner or operator generates or used oil received from household do-it-yourself generators?	☐ Yes ☐ No ☑ NA	
b. The heater is designed to have a maximum capacity of not more than 0.5 million British Thermal Units per hour?	☐ Yes ☐ No ☐ NA	
c. The combustion gasses from the heater are vented to ambient air?	☐ Yes ☐ No ☐ NA	

Regulation and Standard		*Violations*
279.24 Off-Site Shipment		used oil xfrd to residual fuels tank/s, which have ~125K gal. cap.
1. Has the generator ensured that the used oil is hauled only by a transporter that has obtained a U.S. Environmental Protection Agency (EPA) identification (ID) number?	☐ Yes ☐ No ☐ NA	
2. Does the generator have a tolling arrangement with a transporter without an EPA ID number?	☐ Yes ☐ No ☐ NA	
If yes, answer the three following questions. If no, move to question 6.		
3. Is the used oil reclaimed and returned by the processor or re-refiner to the generator for use as a lubricant, cutting oil, or coolant?	☐ Yes ☐ No ☐ NA	
4. Does the tolling contract indicate the type of used oil and the frequency of shipment?	☐ Yes ☐ No ☐ NA	
5. Is the vehicle used to transport the used oil to the processing or re-refining facility and to deliver recycled used oil back to the generator owned and operated by the used oil processor or re-refiner?	☐ Yes ☐ No ☐ NA	
6. Does the generator transport used oil generated at the generator's site or used oil collected from household do-it-yourselfers to a used oil collection center or to aggregation points owned by the generator?	☐ Yes ☐ No ☐ NA	

Regulation and Standard		*Violations*
7. Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator?	☐ Yes ☐ No ☐ NA	
8. Does the generator transport no more than 55 gallons of used oil at any time?	☐ Yes ☐ No ☐ NA	
9. Does the generator transport the used oil to a used oil collection center that is registered, licensed, permitted, or recognized by a state/county/municipal government to manage used oil?	☐ Yes ☐ No ☐ NA	

For further Used Oil questions refer to Appendix 2-4:

Subpart D – Standards for Used Oil Collection Centers and Aggregation Points
Subpart E – Standards for Used Oil Transporters and Transfer Centers
Subpart F – Standards for Used Oil Processors and Re-Refiners
Subpart G – Standards for Used Oil Burners Who Burn Off-Specification Used Oil for Energy Recovery
Subpart H – Standards for Used Oil Fuel Marketers

Spoke with Bishop on 9/12/10. Informed him putting used oil in #6 fuel oil tank, which is blended with other residual fuel oils for use as fuel, is/makes CPTC a marketer of used oil fuel. I referred Mr. Bishop to MDNR website for guidance on regulations for used oil marketers. Bishop said they wouldn't be doing this any longer because the #6 fuel oil they had was shipped to another terminal about two weeks ago.

Appendix 1-10 EXIT BRIEFING

1. Reviewed all data collected and documented all concerns or violations? ☐ Yes ☐ No
   - Location of the violation, type and amount of waste involved, time frame, frequency, specific dates & when first started occurring.
   - Illegal units-unit location (diagram/picture), dimensions, conditions, construction material, gradient of the base (for spills), other information.
   - Illegal disposal-how, when (each occurrence), where sent or disposed of, how shipped, who shipped, when shipped/disposed of, quantity.

N/A ☐ Identified/verified violations from previous inspection were corrected (if applicable)
☑ Addressed all unresolved inspection related issues
☑ Summarized findings and observations for the facility representatives

NOV issued? ☑ Yes ☐ No ☑ Violations clearly identified and explained, including: circumstances, location, and applicable regulations

☑ Explained the importance of a timely (14 day) and adequate response
☑ Explained that findings and observations are based on your current knowledge of RCRA and that the final findings may differ
☑ Explained that compliance officer will make final compliance decisions and that all compliance questions should be directed toward them
☑ Explained that recommendations provided are for informational purposes only and DO NOT require specific actions by the facility
☑ Provided facility with CBI form
☐ Prepared Document Receipt form

3. Specific information requested from facility? ☑ Yes ☐ No
I said I would call back to find out about qty of spent lamps

4. Facility appears to have awareness of RCRA regulations? ☑ Yes ☐ No somewhat

5. Facility has its own environmental staff? ☐ Yes ☑ No Bishop is it

6. Facility has copy of applicable regulations? ☑ Yes ☐ No

7. Attitude and demeanor of facility representative(s); ☑ OK ☐ Not OK

8. Notes/Observations:

PHOTO LOG

Facility Name / City: Center Point Terminals Company
St. Louis, Missouri
Facility ID #: MOD000690040
Date : August 25, 2010
Photographer: David N. Whiting
Type of Camera: Canon Power Shot G5, Serial #: 6924106034
Digital Recording Media: Flashcard
All digital photos were copied by: David N. Whiting on 09/22/10
All digital photos were copied to: CD-R
Original copy is stored in: CD-R. Digital photos were downloaded to CD-R by David N. Whiting. No changes were made in the original image files prior to storage on the CD-R.

Report Photo #	Photographer	Date	Approx. Time	File Name (IMG_xxx.jpg)	Description
1	David N. Whiting	08/25/10	2:15 pm	0827.jpg	Used oil storage tank is not marked "used oil."
2	David N. Whiting	08/25/10	2:15 pm	0828.jpg	Used oil storage tank is not marked "used oil."

Photo 1 Used oil storage tank is not marked "used oil."

Photo 2 Used oil storage tank is not marked "used oil."